

Privacy Policy¹

We are committed to safeguarding the privacy of our website visitors; this policy² sets out how we will treat your personal information.³

(1) What information do we collect?

We may collect, store and use the following kinds of personal information:

- [(a) information about your computer and about your visits to and use of this website (including [your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views, website navigation and *details*]);]
- [(b) information relating to any transactions carried out between you and us on or in relation to this website, including information relating to any purchases you make of our goods or services (including *details*);]
- [(c) information that you provide to us for the purpose of registering with us (including *details*);]
- [(d) information that you provide to us for the purpose of subscribing to our website services, email notifications and/or newsletters (including *details*);]
- [(e) any other information that you choose to send to us; and]
- [(f) *other information.*]⁴

(2) Cookies⁵

¹ The purpose of a website privacy policy is help webmasters and web-based businesses comply with data protection legislation. In the UK, that primarily means compliance with the Data Protection Act 1998 and the Privacy and Electronic Communications (EC Directive) Regulations 2003. Failure to comply with data protection legislation can lead to civil liability and criminal law penalties. Our template privacy policy is designed for use by businesses based in the UK (although the UK data protection regime derives from EU law, there are differences in how that EU law has been implemented in the different member states of the EU). The template is designed for websites which collect standard kinds of non-sensitive personal data for standard kinds of use. It may be unsuitable for websites which collect sensitive personal data (such as information relating to a person's health, sexuality, ethnicity or politics) or which collect personal information from children. It may be suitable, for example, for use with websites which act as online company brochures or online shops. The website privacy policy template will need to be edited before it is ready for use. Square brackets in the document indicate the sections which need or are likely to need to be edited. However, you should of course carefully review the whole document to ensure that it meets with your requirements. You should regularly review your privacy policy to ensure that it remains up-to-date, both with respect to the law and to your business's use of personal data. Please note that the use of a privacy policy does not exhaust your data protection obligations. If you are in any doubt regarding the preparation of your privacy policy or your data protection obligations generally, you should seek professional advice.

² The privacy policy should be clearly and easily accessible to website visitors from the website home page and any page which collects personal data (e.g. "The personal information we collect on this page will be treated in accordance with our [privacy policy](#)"). In addition, key information about the use of personal data should be provided on the page where the data is collected, rather than in a separate document.

³ "Personal information": for day-to-day purposes, it is best to assume that all information which relates to a living individual constitutes personal information. (We use "personal data" and "personal information" interchangeably in this template.)

⁴ You should list in this provision all of the different kinds of personal information which will be collected over or in relation to your website. We have suggested a number of common categories.

A cookie consists of information sent by a web server to a web browser, and stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We [may] use [both] ["session" cookies] [and "persistent" cookies] on the website. [We will use the session cookies to: keep track of you whilst you navigate the website; and [other uses].] [We will use the persistent cookies to: enable our website to recognise you when you visit; and [other uses].]

[Session cookies will be deleted from your computer when you close your browser.]
[Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date.]

[We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at: <http://www.google.com/privacypolicy.html>.]⁶

Most browsers allow you to reject all cookies, whilst some browsers allow you to reject just third party cookies. For example, in Internet Explorer you can refuse all cookies by clicking "Tools", "Internet Options", "Privacy", and selecting "Block all cookies" using the sliding selector. Blocking all cookies will, however, have a negative impact upon the usability of many websites[, including this one].]

(3) Using your personal information

Personal information submitted to us via this website will be used for the purposes specified in this privacy policy or in relevant parts of the website.

We may use your personal information to:

- [(a) administer the website;]
- [(b) improve your browsing experience by personalising the website;]
- [(c) enable your use of the services available on the website;]
- [(d) send to you goods purchased via the website, and supply to you services purchased via the website;]
- [(e) send statements and invoices to you, and collect payments from you;]

⁵ If your site does not use cookies, the paragraphs on cookies can be deleted.

New UK laws relating to cookies are expected to be brought in during 2010 or 2011. These laws will change the rules concerning cookies and user consent. You should review your policy on cookies after the new laws have been published.

⁶ If you don't use Google Analytics, you should check whether your analytics system uses cookies and include an appropriate explanatory paragraph if it does.

- [(f) send you general (non-marketing) commercial communications;]
- [(g) send you email notifications which you have specifically requested;]
- [(h) send to you [our newsletter and other] marketing communications relating to our business [or the businesses of carefully-selected third parties] which we think may be of interest to you by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications)⁷;
- [(i) provide third parties with statistical information about our users – but this information will not be used to identify any individual user;]
- [(j) deal with enquiries and complaints made by or about you relating to the website; and]
- [(k) *other uses.*]⁸

[Where you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the license you grant to us.]⁹

[We will not without your express consent provide your personal information to any third parties for the purpose of direct marketing.]¹⁰

[All our website financial transactions are handled through our payment services provider, PayPal. You can review the PayPal privacy policy at www.paypal.com. We will share information with PayPal only to the extent necessary for the purposes of processing payments you make via our website and dealing with complaints and queries relating to such payments.]¹¹

(4) Disclosures

We may disclose information about you to [any of our employees, officers, agents, suppliers or subcontractors] insofar as reasonably necessary for the purposes as set out in this privacy policy.

In addition, we may disclose your personal information:

- (a) to the extent that we are required to do so by law;
- (b) in connection with any legal proceedings or prospective legal proceedings;

⁷ As a general rule, where you plan to use personal information you have collected for the purpose of direct marketing, this should be made clear on the page where the information is collected, and you should ensure that this only happens if users opt-in to the marketing (e.g. "Click here if you would like us to send you information by email about products which we think will interest you..."). There are however exceptions to this general rule. There are also rules about the content of direct marketing communications. If you are in any doubt about complying with your legal obligations in relation to direct marketing, you should seek professional advice.

⁸ You must list here all the uses to which you will (or may in future) put personal data. Again, we have suggested some common categories.

⁹ The relevant licence should be set out in the appropriate disclaimer/terms of use/terms of subscription etc. document.

¹⁰ It is good practice to also say what you will not do with personal information (within reason).

¹¹ You should insert details of any payment services provider(s) you use here. If you don't collect payments on your website, you can delete this section.

- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
- [(d) to the purchaser (or prospective purchaser) of any business or asset which we are (or are contemplating) selling; and]
- [(e) to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.]

Except as provided in this privacy policy, we will not provide your information to third parties.

[(5) International data transfers¹²

Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this privacy policy.

Information which you provide may be transferred to countries [(including [the United States], [Japan], [*other countries*])] which do not have data protection laws equivalent to those in force in the European Economic Area.

[In addition, [personal information that you submit for publication on the website] will be published on the internet and may be available, via the internet, around the world. We cannot prevent the use or misuse of such information by others.]

You expressly agree to such transfers of personal information.]

(6) Security of your personal information

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

[We will store all the personal information you provide on our secure (password- and firewall- protected) servers. All electronic transactions you make to or receive from us will be encrypted [using SSL technology].] ¹³

Of course, data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

[You are responsible for keeping your password and user details confidential. We will not ask you for your password (except when you log in to the website).]

¹² Give as much detail as possible about any such international transfers. You also need to be aware that the inclusion of this provision will not be sufficient to ensure that all international transfers of personal data are lawful. If in doubt, you should take professional advice on this point.

¹³ There is an obligation upon data controllers to store personal data securely. You should provide details of your security measures here.

(7) Policy amendments¹⁴

We may update this privacy policy from time-to-time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes.

[We may also notify you of changes to our privacy policy by email.]

(8) Your rights

You may instruct us to provide you with any personal information we hold about you. Provision of such information will be subject to:

- (a) the payment of a fee (currently fixed at £10.00); and
- (b) the supply of appropriate evidence of your identity [(for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address)].

We may withhold such personal information to the extent permitted by law.

You may instruct us not to process your personal information for marketing purposes by email at any time. In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt-out of the use of your personal information for marketing purposes.

(9) Third party websites

The website contains links to other websites. We are not responsible for the privacy policies or practices of third party websites.

(10) Updating information

Please let us know if the personal information which we hold about you needs to be corrected or updated.

(11) Contact

If you have any questions about this privacy policy or our treatment of your personal information, please write to us by email to [*email*] or by post to [*postal address*].¹⁵

(12) Data controller

The data controller responsible in respect of the information collected on this website is [*company/business name*].

Our data protection registration number is [*number*].¹⁶

¹⁴ Changes to the policy – in particular as to permissible uses of personal data – may not be retrospective. In other words, if you collect personal information on one basis, you cannot, simply by changing the terms of your policy, go on to legitimately use that information on a different basis.

¹⁵ You should include a postal address as well as an email address.

¹⁶ You should check whether you need to obtain a data protection registration. You can find out about this on the Information Commissioner's website at <http://www.ico.gov.uk>.