
SWT DIGITAL LTD PRIVACY POLICY

SWT Digital Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this Website, www.swtdigital.com (“Our Website”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Account”	means an account required to access and/or use certain areas and features of Our Website;
“Cookie”	means a small text file placed on your computer or device by Our Website when you visit certain parts of Our Website and/or when you use certain features of Our Website. Details of the Cookies used by Our Website are set out in Part 14, below; and
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003, or any relevant successor legislation from time to time;

2. Information About Us

Our Website is owned and operated by SWT Digital Ltd, registered in England under company number 11513515, whose registered address is 73 Albert Road, Colne, Lancs. BB8 0BP. Data Protection Officer is Kevin Varley, Email: hello@swtdigital.com

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Website. Our Website may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

4. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data and we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves however, so please contact us first, using the details in Part 15.

6. What Data Do We Collect and How?

Please see Part 14 for more information about our use of Cookies and similar technologies. We do not collect any 'special category', 'sensitive' personal data, personal data relating to children or data relating to criminal convictions and/or offences. If you use the contact form on our website or email us, we will store and process your contact data for the sole purpose of following up with you. If your contact with us does not result in work being quoted for or undertaken, then unless you consent to us storing for longer or other purposes, we will delete your contact personal data after 30 days, or sooner if you request it.

7. How Do We Use Your Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data.

We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

Third Parties may use third-party Cookies, as detailed below in Part 14. Please refer to Part 14 for more

information on controlling cookies. Please note that we do not control the activities of such third parties, nor the data that they collect and use themselves, and we advise you to check the privacy policies of any such third parties.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and we need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 15.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

8. How Long Will We Keep Your Personal Data?

We will not keep Personal Data in a form which permits the identification of the Data Subject for longer than needed for the legitimate business purposes for which we originally collected it including for the purpose of satisfying any legal, accounting or reporting requirements. We will take all reasonable steps to destroy or erase from our systems all Personal Data that we no longer require and we will act in compliance with our legal duties.

9. How and Where Do We Store or Transfer Your Personal Data?

We will only store or transfer your personal data within the UK. This means that it will be fully protected under the Data Protection Legislation.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

10. Do We Share Your Personal Data?

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 9.

11. How Can You Control Your Personal Data?

11.1 In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Website, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which

you may do by unsubscribing using any links provided in our emails and at the point of providing your details.

11.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

12. **Can You Withhold Information?**

You may access certain areas of Our Website without providing any personal data at all. However, to use all features and functions available on Our Website you may be required to submit or allow for the collection of certain data.

You may restrict the use of Cookies. For more information see Part 14.

13. **How Can You Access Your Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15. There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 28 days of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

14. **How Do We Use Cookies?**

Certain features of Our Website depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. You need consent when cookies are not strictly necessary. ‘Strictly necessary’ means that storage of (or access to) information should be essential, rather than reasonably necessary. It is also restricted to what is essential to provide the service requested by the user. It does not cover what might be essential for any other uses that you might wish to make of that data. It is therefore clear that the strictly necessary exemption has a narrow application. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below, but please be aware that Our Website may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

By using Our Website, you may also receive certain third-party Cookies on your computer or device if you follow 3rd party links. Third-party Cookies are those placed by websites, services, and/or parties other than us. These Cookies are not integral to the functioning of Our Website and your use and experience of Our Website will not be impaired by refusing consent to them.

All Cookies used by and on Our Website are used in accordance with current Cookie Law.

In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Website more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

15. How Do You Contact Us?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details: for the attention of Kevin Varley, SWT Digital Ltd, 73 Albert Road, Colne, Lancs. BB8 0BP Email: hello@swtdigital.com

16. Changes to this Privacy Policy

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection. Any changes will be posted on Our Website and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Website following the alterations. We recommend that you check this page regularly to keep up-to-date.

17. Monitoring our Website

We use Simple Analytics (<https://simpleanalytics.com/>) to allow us to monitor usage of our Website and thereby allow us to improve and adapt it to our customers. This provides us with critical information about the behaviour of our visitors. This analytics software gives us insight about our visitors in general, but not about individuals by itself, as it does not track visitors and does not store any personal identifiable information. For further information about what Simple Analytics collects and why please see this link <https://docs.simpleanalytics.com/what-we-collect>

Simple Analytics is GDPR and PECR compliant and does not need consent. It tracks page views from a script in the browser and doesn't use cookies or similar technologies and Do Not Track settings are respected. Simple Analytics doesn't store IPs in any way and doesn't use techniques that identify or track a user.