Website Privacy Notice

1. INTRODUCTION

This privacy notice provides you with details of how we collect and process your personal data through your use of our site (alisonlyonbehrens.com).

Alison Lyon-Behrens is the data controller and responsible for your personal data. If you have any questions about this notice or how your information is used, please contact Alison at alisonlyonbehrens@icloud.com, or via post at Room 37 Hastings Town Hall, Queens Rd, Hastings, East Sussex TN34 1QR

2. WHAT DATA DO WE COLLECT ABOUT YOU, FOR WHAT PURPOSE AND ON WHAT GROUND WE PROCESS IT

Personal data means any information capable of identifying an individual. It does not include anonymised data. We may process the following categories of personal data about you:

Communication Data

This includes any communication that you send to us whether that be through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.

Customer Data

This includes data relating to any purchases of goods and/or services such as your name, title, billing address, delivery address, email address, phone number, contact details, purchase details and your card details. We process this data to supply the goods and/or services you have purchased and to keep records of such transactions. Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.

User Data

This includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back-ups of our website and/or databases and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.

Technical Data

If gathered, this includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the

devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.

Marketing Data

This includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in our promotions such as competitions, prize draws and free give-aways, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising. Our lawful ground for this processing is either consent, contract or our legitimate interests which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy.

We may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you (including Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you. Our lawful ground for this processing is legitimate interests which is to grow our business. We may also use such data to send other marketing communications to you. Our lawful ground for this processing is either consent or legitimate interests (namely to grow our business or for direct marketing).

We may also use Communications Data, Customer Data, User Data, Technical Data and Marketing Data for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to establish, pursue or defend legal claims.

Required Processing

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

Purposes of Processing

We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this please email us at alisonlyonbehrens@icloud.com In case we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing.

3. MARKETING COMMUNICATIONS

Our lawful ground of processing your personal data to send you marketing communications is either your consent, our legitimate interests (namely to grow our business).

Under the Privacy and Electronic Communications Regulations (PECR), we may send you marketing communications from us if (i) you made a purchase or asked for information from us about our goods or services or (ii) you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However, you can still opt out of receiving marketing emails from us at any time.

We will never share your personal details with any third party for their own marketing purposes.

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by emailing us at alisonlyonbehrens@icloud.com at any time.

If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions, such as purchases, warranty registrations etc.

4. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below:

- Service providers who provide IT and system administration services and marketing services.
- Professional advisers including lawyers, bankers, auditors and insurers.
- Government bodies that require us to report processing activities.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

5. INTERNATIONAL TRANSFERS

We are subject to the provisions of the UK General Data Protection Regulations (UK GDPR) that protect your personal data. Where we transfer your data to third parties outside of the UK, we will ensure that certain safeguards are in place to ensure a similar degree of security for your personal data. As such:

- We may transfer your personal data to countries that the United Kingdom regulatory authorities have approved as providing an adequate level of protection for personal data; or
- If we use US-based providers that are part of the UK-US Data Bridge (the UK Extension to the EU-US Data Privacy Framework), we may transfer data to them, as they have equivalent safeguards in place; or
- Where we use certain service providers who are established outside of the UK, we may use specific contracts approved by the ICO (the International Data Transfer Agreement or the UK Addendum to the EU

Standard Contractual Clauses), or codes of conduct or certification mechanisms approved by the UK government, which give personal data the same protection it has in the UK.

If none of the above safeguards are available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

6. DATA SECURITY

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

7. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8. YOUR LEGAL RIGHTS

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

If you are within the UK, you can see more about these rights at:

https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/

If you wish to exercise any of the rights set out above, please email us at alisonlyonbehrens@icloud.com

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

When responding to a request to access your personal data, we are only required to carry out searches that are reasonable and proportionate in the circumstances (as now expressly recognised in the Data (Use and Access) Act 2025). This means we will take into account factors such as the nature of the information sought, the context in which it is held, any difficulty involved in locating it and the potential benefit to you of receiving it.

We try to respond to all legitimate requests within one month of receiving the request (or, where applicable, of receiving the identity verification information or clarification we have asked for - the response period is paused, or "stopped", while we wait for that information, in line with the Data (Use and Access) Act 2025).

Occasionally it may take us longer than one month if your request is particularly complex or you have made a number of requests, in which case we may extend the response period by up to a further two months. We will notify you within one month of receiving your request if an extension is needed and explain why.

9. HOW TO COMPLAIN

If you have a complaint about how we handle your personal data, we ask that you contact us first so that we can try to resolve it for you. You can submit a data protection complaint to us by emailing alisonlyonbehrens@icloud.com or via post at the following address: Room 37, Hastings Town Hall, Queens Rd, Hastings, East Sussex TN38 1QR

We will acknowledge your complaint within 30 days of receiving it. We will investigate your complaint without undue delay, keep you informed of our progress, and communicate the outcome to you clearly with sufficient detail for you to understand how we reached our conclusion.

If you are within the UK and are not satisfied with our response, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

10. THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

11. COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see https://support.wix.com/en/article/cookies-and-your-wix-site

You can find our detailed cookie policy here: https://www.dropbox.com/scl/fi/fqcpmcvlttcb3sdm9ono1/Cookie-Policy.docx?rlkey=n0zb85rav1qoxu7xrt4nfh2mh&dl=0