

# Privacy Statement

Hammett Associates respects the privacy of its website visitors, particularly, the rights of visitors with regards to the automated processing of personal data. Because of complete transparency to our customers, we have formulated and implemented a policy of these processing operations, their purpose and the possibilities for those involved to exercise their rights to their full ability. You should be aware that Hammett Associates is not responsible for the privacy policy of other sites that are accessible via a link on our website. We recommend that you consult the privacy statement and disclaimer of the other website when accessing third party websites through our website.

The law requires us to inform you about your rights and our obligations to you with regards to the processing and control of your personal data. To this end, we request that you read the information provided at [www.knowyourprivacyrights.org](http://www.knowyourprivacyrights.org)

On our website we use cookies and other tracking systems. By continuing to visit our website, you accept the following terms and conditions and you agree with our cookies.

We may update this privacy policy from time to time as deemed necessary. The version of the privacy policy available on the website is the only version that applies for the duration of your visit, until a new version replaces the current version.

Privacy-sensitive data, or personal data, is processed via [Informanagement.co.uk](http://Informanagement.co.uk). Informanagement UK Ltd places great importance in the handling of personal data. Personal data is therefore carefully processed and secured by us.

Our privacy policy has been compiled in order to comply with the law of every country or legal jurisdiction in which we aim to do business. In our processing, we comply with the requirements set by the General Data Protection Regulation (GDPR).

*This privacy statement was last updated on 3<sup>rd</sup> May 2018.*

## **Use of personal data**

Your data is collected by the host of our website and newsletters, Informanagement UK Ltd, on our behalf. Personal data means: all information about an identified or identifiable natural person; an identifiable natural person who can be identified directly or indirectly, in particular by means of an identifier such as a name, an identification number, location, an online identifier or one or more elements that are characteristics of the physical, physiological, genetic, psychological, economic, cultural or social identity. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means to collect, store, transfer, use or otherwise act on the information.

By using our service, you leave certain information with us. This could be personal data. We only keep and use the personal data provided by you, within the framework of the service you request, or when it is clear, that they are provided to us to process.

We use the following data for the purposes mentioned in this privacy statement:

- Name, address and postcode
- Telephone number
- Email address

### **Handling orders**

When you place an order with us, we use your personal data for the processing thereof. If necessary for further processing, we may also provide your personal data to third parties. You can read more about this later in this privacy statement.

### **Advertisement**

We may, in addition to the information on our website, inform you about our (new) products and services by;

- Email
- Telephone
- Direct mail (post)
- Social media

### **Contact form**

If you fill out a contact form on the website, or send us an email, the data sent to us will be kept for as long as the nature of the details in the form or the content within your email is required by us to fulfill your request.

### **Publishing**

We do not publish your data unless express permission has been granted.

### **Third parties**

We do not provide your personal data to third parties without your permission, unless we are obliged to do so based on the law, a court decision or if necessary for the execution of an agreement between you and Informagement (implied consent).

Our website and newsletters are hosted and managed by Informagement UK Limited. Informagement UK Limited is a GDPR compliant company, which means they meet the conditions of the GDPR.

### **Security**

We take security measures to limit abuse of, and unauthorised access to, personal data. We keep statistics on our website, but this is always done anonymously.

### **Retention period**

Hammett Associates does not store your data longer than necessary for the purposes for which they were collected and processed.

### **Cookies**

We use cookies on the [www.hammett-associates.co.uk](http://www.hammett-associates.co.uk) URL website. A cookie is a small text file that is placed on the hard disk of your computer when you visit our website. A cookie contains data so you can be recognized as a visitor during each visit to our website. This enables us to set up our website for you specifically and facilitates log in. When you visit our website, a banner appears informing you about the use of cookies. By continuing to use our website you accept its use. For more information about the use, management and removal of cookies for each type of control, we invite you to consult the browser that you are using. Below we describe which cookies we use and which measures have been taken.

#### **Functional cookies**

Such as session and login cookies for tracking a session and login information.

#### **Analytical cookies**

To analyse a visit to our website based on information regarding visitor numbers, popular pages and topics. This enables us to tailor make the communication and information provision to our website visitors' needs. We are not able to see who visits our website or from which PC/Device the visit takes place.

#### **Tracking cookies**

Such as advertising cookies that are meant for showing relevant advertisements. Personal interest can be derived from the information of visited websites. This allows organisations, for example, to show their website visitors targeted advertisements. Tracking cookies make it possible to create profiles of people and treat them differently. Personal data is usually processed with tracking cookies.

#### **Google analytics**

The [informanagement.co.uk](http://informanagement.co.uk) website uses cookies within Google Analytics. This is mainly to measure how the website can be made more user-friendly and to see which target groups visit our website. To make Google Analytics "Privacy-friendly" we have taken the following actions:

- Sought a processing agreement with Google;
- Made sure your data is processed pseudo-anonymously (=Pseudo-anonymous data = personal data that is processed in such a way that it can no longer be traced without the

use of additional information, but which makes a person individual, such as an encrypted email address or user ID);

- Your data is not shared. This has been disabled;
- We do not use other Google services in combination with Google Analytics Cookies.

## **Hotjar**

Hotjar contains the possibility to use user recordings to view users navigating through the website. A registration is made of page views, mouse movements, clicks and data input.

These recordings in Hotjar are pseudo-anonymous. This means that we have the user recording information at our disposal, but without them being personally identifiable.

This is done as follows:

- Hiding imported information in input fields. Information that a user fills in, for example, such as personal data such as address details or an email address, is not stored. These settings apply across the entire site.
- Hiding specific elements. Specific elements such as input fields and 'normal' text can be excluded from the recordings and heat maps.

## **Facebook tracking cookies**

The Facebook cookie looks at which pages are opened. Based on the website use, we can show relevant information on Facebook. This cookie comes from Facebook and is kept for a maximum of 2 years. The data processed within Facebook falls under pseudo-anonymous data.

## **Facebook and LinkedIn look-a-like audiences**

Facebook and LinkedIn are responsible for the permission to apply this data, you can easily adjust these settings in your own Facebook and/or LinkedIn profile.

## **Changes to this privacy statement**

We reserve the right to make changes to this privacy statement. It is advisable to consult this privacy statement regularly so that you are aware of these changes.

## **Your rights regarding your data**

Pursuant to Article 13 paragraph 2 sub b GDPR everyone has the right to inspect and rectify or erase his personal data or limit the processing concerning him, as well as the right to object to the processing and the right to data portability. You can exercise these rights by contacting us via the details below.

## **View and change your data**

For questions about our privacy statement or questions regarding access and changes to (or deletion of) your personal data, you can contact us at any time via the information below.

**Contact details**

**Hammett Associates**

**8-10 Queen Street  
Seaton  
Devon  
EX12 2NY**

**Offices also at:**

**18 High Street  
Budleigh Salterton  
Devon  
EX9 6LQ**

**21 Heavitree Road  
Exeter  
Devon  
EX1 2LD**

**Co reg number: 05375753**

**01297 624188**

**[info@hammett-associates.co.uk](mailto:info@hammett-associates.co.uk)**

Applicable law

The law of England & Wales applies to this policy.