

PRIVACY POLICY – DRAFT

Who We Are

from you to me Ltd is a publishing company, founded in 2007, that believes in making beautiful gift books and journals that enrich lives by creating cherished moments and capturing special memories. We are a family-run company with family at the heart of everything we do. We produce award-winning gifts that are loved and shared by families and friends everywhere. Many of the products can be personalised to create a truly unique and individual gift.

Our products can be discovered under our two brands:

Journals of a Lifetime®

Journals of a Lifetime are thoughtfully designed gift journals that inspire children and adults to easily reflect on, capture and share special moments and memories from every step of life's journey, bringing people closer together and enriching lives.

Forget Me Not Books®

Forget Me Not Books are illustrated books that create cherished moments. Beautifully designed, they are meaningful and enriching books from amazing authors and illustrators that both children and adults will love to explore and read time and time again. Books that make memories and won't be forgotten.

Our Company Values

Our values go across everything we do, whether that is our products and what they stand for, our relationships with customers, partners and suppliers, as well as our relationship with each other as a team.

- Enriching Lives
- Bonding People (People focussed)
- Capturing & Sharing Moments
- Dedication

Our Commitment To Your Privacy

We are committed to keeping the personal details of our retail and wholesale business safe. This policy explains how and why we use your personal data, to ensure that you remain informed and in control of your information.

We use three key definitions to describe people mentioned in this policy. These are definitions used by the Information Commissioner's Office ([ICO](http://www.ico.org.uk)), the UK's independent body set up to uphold information rights (www.ico.org.uk)

- **'Data subject'**: this is you. As the data subject, we respect your right to control your data.
- **'Data controller'**: this is us. With your permission, we determine why and how your personal data is used (as outlined in this policy).
- **'Data processor'**: this is a person, or organisation, who processes your data on our behalf, with your permission. For example, this might be a mailing house who sends your membership magazine to you, on our behalf (due to the size of our organisation, it's more cost-effective to outsource ad-hoc and large-scale tasks like this).

When we work with other organisations or individuals in this way, we always set up a written contract with them to protect your data. The third parties we work with at no point 'own' your data, so you will never hear from them independently and they will always delete your data from their systems when they have completed the task in hand. We always send your data to partner organisations securely, to minimise the risk of it being intercepted by unknown individuals and/or organisations.

We will never sell your personal data.

Should you wish to find out more about the information we hold about you, or about our privacy policy, please contact us:

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from you to me ltd
The Old Brewery
Newtown
Bradford on Avon
BA15 1NF

Our office hours are Monday – Friday, 9am – 5pm, UK Time.

Why Do We Collect Your Personal Data?

We use your personal data to take and process orders and, where you have agreed, to keep in touch with you.

We will only ever collect, store and use your personal data when we have an identified purpose and reason to do so. The ICO refers to this as a 'lawful basis'. Further information about why we collect your personal data is outlined below.

- a) To process and send you items purchased from our product lines
- b) To process your personalised orders

The ICO define the lawful basis for processing your data for these purposes as 'contractual'.

We also collect your personal data so that we can send you information about our company, offers and new products we feel will be of interest to you. This includes products, newsletter requests, feedback, competitions and other activities.

This information is in addition to that outlined in sections a) and b), and is defined as 'direct marketing' by the ICO.

As defined by the ICO, we use two different lawful bases for processing your data for 'direct marketing' purposes:

- c) Legitimate interest - This is where we have identified a genuine and legitimate reason for contacting you, which crucially does not override your rights or interests

We use legitimate interest to send you the information listed above by **email / Mailchimp, text message (SMS) or telephone**.

- d) Opt-in consent - This is where you have given us express permission to contact you by particular communication channels.

We use opt-in consent to send you the information listed above by **email / Mailchimp, text message (SMS) or telephone**.

We respect your right to update the way we get in touch with you, about our work, at any time.

What Kind Of Personal Data Do We Collect? How Do We Collect It?

a) Basic information for orders

We will usually collect basic information about you, including your name, postal address, telephone number and email address.

Most of the time, we collect this data from you directly when you order a product or gift. Mainly this is when a product is ordered although sometimes this is in person, over the telephone, in writing or through an email.

Occasionally we obtain information, such as your telephone number or other contact details, from external sources (*only where you have given permission for such information to be shared*).

b) Personalised Information

Depending on the personalised product you have ordered you may have provided us with additional information about yourself or the person you are buying for. We will only use that information to create the product you have

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specifically requested and so do so with your consent and permission when you order the product that uses those details.

c) Cookies

Our website uses 'cookies' to help provide you with the best experience we can. Cookies are small text files that are placed on your computer or mobile phone when you browse websites.

Our cookies help us:

- o Make our website work as you'd expect
- o Remember your settings during and between visits
- o Improve the speed/security of the site
- o Allow you to share pages with social networks like Facebook
- o Continuously improve our website for you

Google Analytics Cookies

These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>

YouTube cookies

We embed videos from YouTube. This may set cookies on your computer, particularly if you are logged into a Google or a YouTube account. To find out more, please visit [YouTube's embedding videos information page](#).

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org

d) Third Party Data

From time to time we may pay for the contact details of people who might be interested in hearing from us in future. Before we purchase contact information, we always check the wording used when your information was originally collected, to make sure that we only contact people who have actively expressed an interest in receiving information from third parties.

When providing permission for third party organisations to share your data you should check their Privacy Policies carefully to understand fully how they will process your data.

e) Sensitive Personal Data

We do not collect or store sensitive personal data (such as information relating to health, beliefs or political affiliation).

How Do We Store Your Data?

Security

All of the personal data we process is processed by our team in the UK. However, for the purposes of IT hosting and maintenance your information may be situated outside of the European Economic Area (EEA). This will be done in accordance with guidance issued by the Information Commissioner's Office.

Electronic data and databases are stored on secure computer systems and we control who has access to information (using both physical and electronic means). Our staff receive data protection training and we have a set of detailed data protection procedures which personnel are required to follow when handling personal data.

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Payment security

All electronic forms that request financial data will use the Secure Sockets Layer (SSL) protocol to encrypt the data between your browser and our servers.

If you use a credit card to purchase something online we will pass your credit card details securely to our payment provider Paypal.

from you to me complies with the payment card industry data security standard (PCI-DSS) published by the PCI Security Standards Council, and will never store card details.

Of course, we cannot guarantee the security of your home computer or the internet, and any online communications (e.g. information provided by email or our website) are at the user's own risk.

Data retention period

We will only use and store information for as long as it is required for the purposes it was collected for. We continually review what information we hold, and delete what is no longer required.

For further information, please see our Data Retention Policy in the Appendix.

Your Rights

We respect your right to control your data. These include:

- The right to be informed - This privacy notice outlines how we capture, store and use your data. If you have any questions about any elements of this policy, please contact us.
- The right of access - If you wish to obtain a record of the personal data we hold about you, through a [Subject Access Request](#), we will respond within one month.
- The right to rectification - If we have captured information about you that is inaccurate or incomplete, we will update it.
- The right to erase - You can ask us to remove or randomise your personal details from our records.
- The right to restrict processing - You can ask us to stop using your personal data.
- The right to data portability - You can ask to obtain your personal data from us for your own purposes.
- The right to object - You can ask to be excluded from marketing activity.
- Rights in relation to automated decision making and profiling - We respect your right not to be subject to a decision that is based on automated processing.

For more information on your individual rights, please see the [Information Commissioner's Office](#).

Making A Complaint

from you to me want to exceed your expectation in everything we do. However, we know that there may be times when we do not meet our own high standards. When this happens, we want to hear about it, in order to deal with the situation as quickly as possible and put measures in place to stop it happening again.

We take complaints very seriously and we treat them as an opportunity to develop our approach. This is why we are always very grateful to hear from people who are willing to take the time to help us improve. We can be contacted in the first instance:

The Putting It Right Team
from you to me ltd
The Old Brewery
Newtown
Bradford on Avon
BA15 1NF

hello@fromyoutome.com

Our office hours are Monday – Friday, 9am – 5pm, UK time.

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Information Commissioner's Office

For further assistance with complaints regarding your data, please contact the Information Commissioner's Office, whose remit covers the UK.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF

Telephone: 0303 123 1113
Email: casework@ico.org.uk

Our Policy Is:

- To provide a fair complaints procedure that is clear and easy to use for anyone wishing to make a complaint.
- To publicise the existence of our complaints procedure so that people know how to contact us to make a complaint.
- To make sure everyone in our organisation knows what to do if a complaint is received.
- To make sure all complaints are investigated fairly and in a timely way.
- To make sure that complaints are, wherever possible, resolved and that relationships are repaired.
- To learn from complaints and feedback to help us to improve what we do.

Confidentiality

All complaint information will be handled sensitively, in line with relevant data protection requirements.

Responsibility

Overall responsibility for this policy and its implementation lies with our Managing Director.

Leaving Our Website

We are not responsible for the privacy practices or the content of any other websites linked to our website. If you have followed a link from this website to another website you may be supplying information to a third party.

Get In Touch

Should you wish to find out more about the information we hold about you, or about our privacy policy, please contact us:

from you to me ltd
The Old Brewery
Newtown
Bradford on Avon
BA15 1NF

Our office hours are Monday – Friday, 9am – 5pm, UK time.

We update this policy periodically.
Last updated: May 2018

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APPENDIX I - Data Retention Policy

1. Our commitment to your privacy

We are committed to keeping the personal details of our customer safe and we will never sell your personal data. With your permission, we determine why and how your personal data is used as per our Privacy Policy.

2. Data retention

We will only keep information about you for as long as we need to. We make sure that any companies, which process your data on our behalf (such as our mailing house or printers) do the same. We have varying retention periods for different categories of information depending on our legal obligations and whether there is an administrative need, such as answering customer queries.

After a retention period has elapsed, the data is deleted or archived.

Type of data	Acceptable Retention Period	Method of destruction
Job applications	6 months	Hard copies are shredded. Electronic applications are deleted.
Trade / Wholesale orders	Indefinitely, for statistical analysis & accounting purposes	N/A
Website retail orders	Indefinitely, for statistical analysis & accounting purposes	N/A
Personalised files	12 months from order to allow for re-ordering and correction of errors	Deletion of electronic files

3. Data deletion

If you ask us to delete your personal information, we will anonymise your contact details, and delete all personal information from records of past communication. If you want your personal information deleted, please contact us.