



Privacy Policy
2018

Bluestone360

Privacy Policy Contents



This Privacy Policy sets out how we, [Bluestone360 Ltd](#), collect, store and use information about you when you use or interact with our website, www.bluestone360.co.uk and where we otherwise obtain or collect information about you. This Privacy Policy is effective from 23st May 2018.

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Bluestone360

Summary



This section summarises how we obtain, store and use information about you. It is intended to provide a very general overview only. It is not complete in and of itself and it must be read in conjunction with the corresponding full sections of this Privacy Policy.

Data controller: **Steve Kyffin** and **Mervyn Orchard**

How we collect or obtain information about you:

When you provide it to us (e.g. by contacting us via the online contact form). From your use of our website, using cookies and Occasionally from third parties.

Information we collect: name, contact details, information from cookies, information about your computer or device (e.g. device and browser type), information about how you use our website (e.g. which pages you have viewed, the time when you view them and what you clicked on.

How we use your information:

for administrative and business purposes particularly to contact you to improve our business and website, to fulfil our contractual obligations, and to advertise our

Disclosure of your information to third parties:

only to the extent necessary to run our business.

Do we sell your information to third parties (other than in the course of a business sale or purchase or similar event): No

How long we retain your information:

for no longer than necessary, taking into account any legal obligations we have (e.g. to maintain records for tax purposes), any other legal basis we have for using your information (e.g. your consent, performance of a contract with you or our legitimate interests as a business). For specific retention periods in relation to certain information which we collect from you, please see the main section below entitled How long we retain your information.

How we secure your information:

Using appropriate technical and organisational measures such as storing your information on secure servers, encrypting transfers of data to or from our servers using Secure Sockets Layer (SSL) technology, only granting access to your information where necessary.

Use of cookies

we do use cookies on our website including essential, functional, analytical and targeting cookies. For more information, please visit our cookies policy here: <https://bluestone360.co.uk/cookies>

Use of automated decision making and profiling:

we do not use automated decision making or profiling.

Your rights in relation to your information

- to access your information and to receive information about its use
- to have your information corrected and/or completed
- to have your information deleted
- to restrict the use of your information
- to receive your information in a portable format
- to object to the use of your information
- to withdraw your consent to the use of your information
- to complain to a supervisory authority

Sensitive personal information: we do not intentionally collect what is commonly referred to as 'sensitive personal information'. For more information, please see the main section below entitled [Sensitive Personal Information](#).

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Summary



Our details

The data controller in respect of our website is Steve Kyffin and Mervyn Orchard of Mills Bakery, Royal William Yard, Plymouth, Devon PL1 3RP.

You can contact the data controller by writing to Mills Bakery, Royal William Yard, Plymouth, Devon PL1 3RP or sending an email to Steve@bluestone360.co.uk

If you have any questions about this Privacy Policy, please contact the data controller.

Information we collect when you visit our website

We collect and use information from website visitors in accordance with this section and the section entitled Disclosure and additional uses of your information.

Web server log information

We use an Apache server provider to host our website called Nimbus Hosting, the privacy policy of which is available here: <https://www.nimbushosting.co.uk/docs/privacypolicy.pdf>. Our website server automatically logs the IP address you use to access our website as well as other information about your visit such as the pages accessed, the date and time of the request, and your browser version. Our server is located in the UK.

Use of website server log information for IT security purposes

We do not access log data from our website server **AND/OR** our third party hosting provide collect(s) and store(s) server logs to ensure network and IT security and so that the server and website remain uncompromised. This includes analysing log files to help identify and prevent unauthorised access to our network, the distribution of malicious code, denial of services attacks and other cyber attacks, by detecting unusual or suspicious activity.

Unless we are investigating suspicious or potential criminal activity, we do not make, nor do we allow our

hosting provider to make, any attempt to identify you from the information collected via server logs.

Legal basis for processing: compliance with a legal obligation to which we are subject (Article 6(1)(c) of the General Data Protection Regulation).

Legal obligation: we have a legal obligation to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of our processing of information about individuals. Recording access to our website using server log files is such a measure.

Legal basis for processing: our and a third party's legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: we and our third party hosting provider have a legitimate interest in using your information for the purposes of ensuring network and information security.

Cookies

We do use cookies on our website.

Cookies are data files which are sent from a website to a browser to record information about users for various purposes.

We use cookies and similar technologies on our website, including essential, functional, and analytical cookies. For further information on how we use cookies, please see our cookies policy which is available here:

<https://bluestone360.co.uk/cookies>

You can reject all of the cookies we use on or via our website by changing your browser settings, but doing so can impair your ability to use our website by restricting some or all of its features.

For further information about cookies, including how to change your browser settings, please visit www.allaboutcookies.org or see our cookies policy.

Information we collect when you contact us



We collect and use information from individuals who contact us in accordance with this section and the section entitled Disclosure and additional uses of your information.

Email

When you send an email to the email address displayed on our website we collect your email address and any other information you provide in that email (such as your name, telephone number and the information contained in any signature block in your email).

Legal basis for processing:

our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s):

responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing:

necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract:

where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Transfer and storage of your information

We use a third party email provider to store emails you send us. Our third party email provider is GMail. Their privacy policy is available here: <https://policies.google.com/privacy>

Emails you send us will be stored within the European Economic Area on GMail's servers in Dublin, Ireland. For further information please see the section of this privacy policy entitled [Transfers of your information outside the European Economic Area](#).

Contact form

When you contact us using our contact form, we collect your name, email, phone number, meeting dates and your message. We also collect any other information you provide to us when you complete the contact form.

If you do not provide the mandatory information required by our contact form, you will not be able to submit the contact form and we will not receive your enquiry.

Legal basis for processing:

Our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s):

Responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing:

Necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Transfer and storage of your information

Messages you send us via our contact form will be stored within the European Economic Area on our GMail servers in Dublin, Ireland.

We use a third party contact form provider to store messages you send us. Our contact form provider is GMail. Their privacy policy is available here: <https://policies.google.com/privacy>. Messages you send to us via our contact form will be stored within the European Economic Area on our contact form provider's servers in Dublin, Ireland.

Disclosure and additional uses of your information



This section sets out the circumstances in which will disclose information about you to third parties and any additional purposes for which we use your information.

Disclosure of your information to service providers

We use a number of third parties to provide us with services which are necessary to run our business or to assist us with running our business and who process your information for us on our behalf.

These include the following:

Email provider(s), including GMail. Their privacy policy is available here: <https://policies.google.com/privacy>

Hosting provider(s), including Nimbus Hosting. Their privacy policy is available here: <https://www.nimbushosting.co.uk/docs/privacypolicy.pdf>

Social sharing provider, including Share This. Their privacy policy is available here: <https://www.sharethis.com/privacy/>

Your information will be shared with these service providers where necessary to provide you with the service you have requested.

Legal basis for processing:

legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest relied on:

where we share your information with these third parties in a context other than where is necessary to perform a contract (or take steps at your request to do so), we will share your information with such third parties in order to allow us to run and manage our business efficiently.

Legal basis for processing:

necessary to perform a contract and/or to take steps at your request prior to entering into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: we may need to share information with our service providers to enable us to perform our obligations under that contract or to take the steps you have requested before we enter into a contract with you.

Disclosure of your information to other third parties

We disclose your information to other third parties in specific circumstances, as set out below.

Providing information to third parties such as Google Inc. and Share This. Google collects information through our use of Google Analytics on our website. Google uses this information, including IP addresses and information from cookies, for a number of purposes, such as improving its Google Analytics service. Information is shared with Google on an aggregated and anonymised basis. To find out more about what information Google collects, how it uses this information and how to control the information sent to Google, please see the following page:

<https://www.google.com/policies/privacy/partners/>

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): meeting our contractual obligations to Google under our Google Analytics Terms of Service (<https://www.google.com/analytics/terms/us.html>)

You can opt out of Google Analytics by installing the browser plugin here: <https://tools.google.com/dlpage/gaoptout>

Transfer and storage of your information

Information collected by Google Analytics is stored outside the European Economic Area on Google's servers in the United States of America.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Disclosure and additional uses of your information



Legitimate interest:

running and managing our business efficiently.

Disclosure and use of your information for legal reasons

Indicating possible criminal acts or threats to public security to a competent authority

If we suspect that criminal or potential criminal conduct has been occurred, we will in certain circumstances need to contact an appropriate authority, such as the police. This could be the case, for instance, if we suspect that we fraud or a cyber crime has been committed or if we receive threats or malicious communications towards us or third parties.

We will generally only need to process your information for this purpose if you were involved or affected by such an incident in some way.

Legal basis for processing:

our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests:

preventing crime or suspected criminal activity (such as fraud). In connection with the enforcement or potential enforcement our legal rights

We will use your information in connection with the enforcement or potential enforcement of our legal rights, including, for example, sharing information with debt collection agencies if you do not pay amounts owed to us when you are contractually obliged to do so. Our legal rights may be contractual (where we have entered into a contract with you) or non-contractual (such as legal rights that we have under copyright law or tort law).

Legal basis for processing:

our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest:

enforcing our legal rights and taking steps to enforce our legal rights.

In connection with a legal or potential legal dispute or proceedings

We may need to use your information if we are involved in a dispute with you or a third party for example, either to resolve the dispute or as part of any mediation, arbitration or court resolution or similar process.

Legal basis for processing:

our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s):

resolving disputes and potential disputes.

For ongoing compliance with laws, regulations and other legal requirements

We will use and process your information in order to comply with legal obligations to which we are subject. For example, we may need to disclose your information pursuant to a court order or subpoena if we receive one.

Legal basis for processing:

compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).

Legal obligation(s):

legal obligations to disclose information which are part of the laws of England and Wales or if they have been integrated into the United Kingdom's legal framework (for example in the form of an international agreement which the United Kingdom has signed).

Legal basis for processing:

our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest:

where the legal obligations are part of the laws of another country and have not been integrated into the United Kingdom's legal framework, we have a legitimate interest in complying with these obligations.

How long we retain your information



This section sets out how long we retain your information. We have set out specific retention periods where possible. Where that has not been possible, we have set out the criteria we use to determine the retention period.

Retention periods

Server log information: we retain information on our server logs for 60 days.

Correspondence and enquiries:

when you make an enquiry or correspond with us for any reason, whether by email or via our contact form, we will retain your information for as long as it takes to respond to and resolve your enquiry, and store the email to refer to later.

Criteria for determining retention periods

In any other circumstances, we will retain your information for no longer than necessary, taking into account the following:

the purpose(s) and use of your information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future;

whether we have any legal obligation to continue to process your information (such as any record-keeping obligations imposed by relevant law or regulation);

whether we have any legal basis to continue to process your information (such as your consent);

how valuable your information is (both now and in the future);

any relevant agreed industry practices on how long information should be retained;

the levels of risk, cost and liability involved with us continuing to hold the information;

how hard it is to ensure that the information can be kept up to date and accurate; and any relevant surrounding circumstances (such as the nature and status of our relationship with you).

How we secure your information



We take appropriate technical and organisational measures to secure your information and to protect it against unauthorised or unlawful use and accidental loss or destruction, including:

- Only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
- using secure servers to store your information;
- Verifying the identity of any individual who requests access to information prior to granting them access to information;
- using Secure Sockets Layer (SSL) software to encrypt [any information you submit to us via any forms on our website; and
- only transferring your information via closed system or encrypted data transfers.

Transmission of information to us by email

Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means), you do so entirely at your own risk.

We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.

Your rights in relation to your information



Subject to certain limitations on certain rights, you have the following rights in relation to your information, which you can exercise by writing to Mills Bakery, Royal William Yard, Plymouth PL1 3RP or sending an email to steve@bluestone360.co.uk

- **To request access to your information and information related to our use and processing of your information;**
- **To request the correction or deletion of your information;**
- **To request that we restrict our use of your information;**

To receive information which you have provided to us in a structured, commonly used and machine-readable format

(e.g. a CSV file) and the right to have that information transferred to another data controller (including a third party data controller);

To object to the processing of your information for certain purposes

(for further information, see the section below entitled Your right to object to the processing of your information for certain purposes);

To withdraw your consent to our use of your information at any time where we rely on your consent to use or process that information.

Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent.

In accordance with Article 77 of the General Data Protection Regulation, you also have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or of an alleged infringement of the General Data Protection Regulation.

For the purposes of the UK, the supervisory authority is the Information Commissioner's Office (ICO), the contact details of which are available here: <https://ico.org.uk/global/contact-us/>

Further information on your rights in relation to your personal data as an individual

The above rights are provided in summary form only and certain limitations apply to many of these rights. For further information about your rights in relation to your information, including any limitations which apply, please visit the following pages on the ICO's website:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protectionregulation-gdpr/individual-rights/>;

and

<https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

Your rights in relation to your information



You can also find out further information about your rights, as well as information on any limitations which apply to those rights, by reading the underlying legislation contained in Articles 12 to 22 and 34 of the General Data Protection Regulation, which is available here: http://ec.europa.eu/justice/data-protection/reform/files/regulation_oj_en.pdf

Verifying your identity where you request access to your information

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so.

These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.

How we verify your identity

Where we possess appropriate information about you on file, we will attempt to verify your identity using that information.

If it is not possible to identify you from such information, or if we have insufficient information about you, we may require original or certified copies of certain documentation in order to be able to verify your identity before we are able to provide you with access to your information.

We will be able to confirm the precise information we require to verify your identity in your specific circumstances if and when you make such a request.



Your right to object to the processing of your information for certain purposes

You have the following rights in relation to your information, which you may exercise in the same way as you may exercise by writing to Mills Bakery, Royal William Yard, Plymouth PL1 3RQ or sending an email to steve@bluestone360.co.uk

To object to us using or processing your information where we use or process it in order to **carry out a task in the public interest or for our legitimate interests**, including 'profiling' (i.e. analysing or predicting your behaviour based on your information) based on any of these purposes; and

To object to us using or processing your information for **direct marketing purposes** (including any profiling we engage in that is related to such direct marketing).

You may also exercise your right to object to us using or processing your information for direct marketing purposes by:

Sending an email to steve@bluestone360.co.uk asking that we stop sending you marketing communications or by including the words "**OPT OUT**".

For more information on how to object to our use of information collected from cookies and similar technologies, please see the section entitled How to accept or reject cookies in our cookies policy, which is available here:

<https://bluestone360.co.uk/cookies>

Sensitive Personal Information



‘Sensitive personal information’ is information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic information, biometric information for the purpose of uniquely identifying an individual, information concerning health or information concerning a natural person’s sex life or sexual orientation.

We do not knowingly or intentionally collect sensitive personal information from individuals, and you must not submit sensitive personal information to us.

If, however, you inadvertently or intentionally transmit sensitive personal information to us, you will be considered to have explicitly consented to us processing that sensitive personal information under Article 9(2)(a) of the General Data Protection Regulation. We will use and process your sensitive personal information for the purposes of deleting it.

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Changes to our Privacy Policy



We update and amend our Privacy Policy from time to time.

Minor changes to our Privacy Policy

Where we make minor changes to our Privacy Policy, we will update our Privacy Policy with a new effective date stated at the beginning of it. Our processing of your information will be governed by the practices set out in that new version of the Privacy Policy from its effective date onwards.

Major changes to our Privacy Policy or the purposes for which we process your information

Where we make major changes to our Privacy Policy or intend to use your information for a new purpose or a different purpose than the purposes for which we originally collected it, we will notify you by email (where possible) or by posting a notice on our website.

We will provide you with the information about the change in question and the purpose and any other relevant information before we use your information for that new purpose.

Wherever required, we will obtain your prior consent before using your information for a purpose that is different from the purposes for which we originally collected it.

Children's Privacy



Because we care about the safety and privacy of children online, we comply with the Children's Online Privacy Protection Act of 1998 (COPPA).

COPPA

COPPA and its accompanying regulations protect the privacy of children using the internet. We do not knowingly contact or collect information from persons under the age of 18. The website is not intended to solicit information of any kind from persons under the age of 18.

It is possible that we could receive information pertaining to persons under the age of 18 by the fraud or deception of a third party. If we are notified of this, as soon as we verify the information, we will, where required by law to do so, immediately obtain the appropriate parental consent to use that information or, if we are unable to obtain such parental consent, we will delete the information from our servers. If you would like to notify us of our receipt of information about persons under the age of 18, please do so by sending an email to steve@bluestone360.co.uk

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Copyright, credit and logo



This Privacy Policy is based on a General Data Protection Regulation (**Regulation (EU) 2016/769 (GDPR)**) compliant template provided by GDPR Privacy Policy. For further information, please visit <https://gdprprivacypolicy.org>

The copyright in this Privacy Policy is either owned by, or licensed to, us and is protected by copyright laws around the world and copyright protection software. All intellectual property rights in this document are reserved.

Where we display the GDPR Privacy Policy logo on our website, this is used to indicate that we have adopted a privacy policy template provided by GDPR Privacy Policy as the basis for this Privacy Policy.