

PRIVACY & COOKIES POLICY

Background

Here at Catnip Comms Limited, we understand that your privacy is important, and just like you, we care about how your personal data is used.

We respect and value the privacy of everyone who visits our website (“Our Site”) and those who work with us. We will only collect and use personal data in a way that is consistent with our obligations, and your rights, under the law.

Please make sure that you read this Privacy & Cookies Policy carefully. It’s important for everyone that you understand it. Your acceptance of this Privacy & Cookies Policy will occur when you tick the consent box on Our Site. In addition, or alternatively, you’ll be required to provide express consent by reading and accepting this Privacy & Cookies Policy when signing terms of business with us.

If you don’t accept and agree with this Privacy & Cookies Policy in any way, you must stop using Our Site immediately.

1. Definitions and Interpretation

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

Cookie”	a small text file placed on your computer or device by Our Site when you visit it and/or use certain features of it. Details of the Cookies used by Our Site are set out in Part 13 below;
“Cookie Law”	the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011; and
“Data Protection Legislation”	means all applicable legislation in force from time to time in the United Kingdom applicable to data protection and privacy including, but not limited to the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (the “UK GDPR”), as it forms part of the law of England and Wales, Scotland, and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018; the Data Protection Act 2018 (and regulations made thereunder); and the Privacy and Electronic Communications Regulations 2003, as amended).

2. What Does This Policy Cover?

This Privacy & Cookies Policy only applies to your use of Our Site and our terms of

business. Our Site 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. We would strongly advise you to check the privacy policies of any such websites before providing any data to them.

3. What Is Personal Data?

Personal data is defined by 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’.

In other words, this is 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.

4. 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.
- b) The right to access the personal data we hold about you.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete.
- d) The right to ask us to delete or otherwise dispose of any of your personal data that we hold.
- 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’re relying on your consent as the legal basis for using your personal data, you’re free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you’ve provided personal data to us directly, we’re using it with your consent, you can ask us for a copy of that personal data to re-use with another data controller.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

Please keep your personal data 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 or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you can contact us at any time using the details in part 13. However, you do have the right to lodge a complaint with the Information Commissioner’s Office though we would welcome the opportunity to resolve your concerns ourselves first.

5. What Data Do You Collect and How?

We may collect and hold some or all of the personal and non-personal data as set out in the table below. Please also see Part 13 for more information about our use of Cookies and similar technologies.

Data Collected	How We Collect the Data	Lawful Basis
Identity Information including first name, last name, title, gender	Via Site including via any installed plugins, over the telephone or via email or in person, social media interaction and other general marketing. Sometimes data may be collected automatically through these mediums.	Consent Legal Obligation Legitimate Interest
Contact information including address, email address, telephone numbers	Via Our Site including via any installed plugins, over the telephone or via email or in person, social media interaction and other general marketing. Sometimes data may be collected automatically through these mediums.	Consent Contract Legal Obligation Legitimate Interest
Technical information including IP address, browser type, device type, and version, country, operating system	Via Our Site and servers. Sometimes data may be collected automatically through these mediums.	Legal Obligation Legitimate Interest
Data from outside of Our Site	Work we may conduct in person, offline or otherwise not through Our Site. Sometimes data may be collected automatically through these mediums.	Contract Legitimate Interest

6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we're only legally able to process your personal data if we have lawful grounds for doing so. More details on these grounds are as follows:

Consent

- 1) Where you have expressly provided your consent to receive communications from us, for example, emails and updates.
- 2) Consenting to the use of non-essential cookies on Our Site is used to make your experience on Our Site more seamless by, for example but not limited to, remembering pages you have previously visited and automatically generated forms.

Contract

Your personal data is necessary for us to manage the contractual relationship with you. It enables us to communicate and carry out any services for which we have been contracted, and keep you updated with any changes to our terms and policies as well as offering you additional services as a valued customer of ours.

Legitimate Interest

Where you have provided your email address or other personal data to us, either online or offline, we may add you to our database for emails to contact you about news on our services and opportunities. We may also use the personal data collected under this lawful basis to help us analyse and administer, improve and update Our Site for better experience, better service we offer.

Legal Obligation

Certain personal data you provide us with, is necessary for us to fulfil our legal obligations as a business. For example (i) verifying your legal and tax status; (ii) appropriate use of Our Site and services; (iii) preventing fraud and security breaches; and (iv) complying with our tax and accounting obligations where needed.

Personal data relating to children

Our Site is not intended for use by anyone under the age of 18.

Marketing Uses

You won't be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Cookies Law, and you'll always have the opportunity to opt-out. See Part 10 for more details.

Other ways we use your personal data

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 need to use your personal data for that additional purpose. If we do use your personal data in this way and you'd like further information on this, please contact us using the details in Part 13.

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 why.

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.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. However, even if we delete your personal data, it may still exist on backup or archival media for legal, tax or regulatory purposes.

8. **How and Where Do You Store or Transfer My Personal Data?**

We will store or transfer some of your personal data within the UK or the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, UK GDPR, and/or to equivalent standards by law. Transfers of personal data to the EEA from the UK are permitted without additional safeguards.

We may store or transfer some or all of your personal data in countries that are not part of the EEA or the UK. These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

We will ensure your personal data is protected under binding corporate rules. Binding corporate rule are a set of common rules which our company is required to follow when processing personal data. For further information, please refer to the ICO; or

We may choose to only store or transfer personal data in or to countries that are deemed to provide an adequate level of protection for personal data. Latest information on adequacy decisions and regulations can be found on the ICO website; or

We may use the latest approved standard contractual clauses and approved contracts to ensure the same levels of personal data protection that apply under the Data Protection Legislation.

Please contact us using the details below in Part 13 for further information about the particular data protection mechanisms used by us when transferring your personal data to a third country. The security of your personal data is essential to us and to protect your data, we take a number of important technical and organisational measures, including the following:

- limiting access to your personal data to those employees, agents, consultants, contractors, Clients and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality and aware of any obligations relating to the use of your personal data by them; and
- 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.

9. **Do You Share My Personal Data?**

Subject to part 8, We will not share any of your personal data with any third parties for any purposes, unless the following exception[s] apply;

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. 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. We may also need to share your personal data to relevant authorities, for example to facilitate the detection of crime or collection of taxes or duties.

We may sometimes contract with third parties to supply certain services as outlined

below:

- a) Google Drive, based in the [UK], for the purposes of data storage;
- b) Our clients, based in the UK, for the purposes of the services we have been engaged for;
- c) Our sub-contractors, based in the UK, for the purposes of completing services for our clients in the not for profit sector; and
- d) Website and IT system administration providers for the maintenance, update and management of Our Site;
- e) Third party marketing tool suppliers to allow us to manage email shots and newsletters to subscribers.

10. **How Can I Control My Personal Data?**

In addition to your rights under the Data Protection Legislation set out in Part 4, we aim to give you strong controls on **our** use of your data for direct marketing purposes. This includes the ability to opt-out of receiving emails from us, which you may do by unsubscribing using the links provided in our emails. You may also restrict our use of Cookies. For more information, see Part 12.

11. **How Can I Access My 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 13.

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’ll respond to your subject access request within **14 calendar days** and, in any case, not more than one month 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’ll be kept fully informed of our progress.

12. **How Do You Use Cookies?**

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve our products **and** services. We’ve carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

The Cookie Law states that we can store Cookies on your device if they are strictly necessary for the operation of Our Site. For all other types of Cookies, we need your permission.

By using Our Site, you may also receive certain third-party Cookies on your computer

or device: (a) **Preference cookies** enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you're in, (b) **Statistic Cookies** help website owners to understand how visitors interact with websites by collecting and reporting information anonymously or (c) **Marketing Cookies** are used to track visitors across different websites or applications. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.

Third-party Cookies are used on Our Site for analytics and SEO such as Google Analytics. These Cookies are not integral to the functioning of Our Site and your use and experience of Our Site will not be impaired by refusing consent to them. You do not have to allow us to use these Cookies. However, whilst our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable us to continually improve Our Site, making it a better and more useful experience for you.

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

Before non-essential Cookies are placed on your computer or device, you'll be shown a pop-up screen requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you're enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of some or all of those Cookies (except for those deemed "strictly necessary" which we do not need your consent for). However, if you do so, certain features of Our Site may not function fully or as intended. You'll be given the opportunity to allow only first-party Cookies, block third-party Cookies or choose which third party Cookies you are consenting to.

You may contact us for more details on strictly necessary and third party Cookies we use.

In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser.

It's 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're unsure about adjusting your privacy settings.

13. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please contact our Data Protection Officer at:

Catnip Comms Limited

Catnip Comms Ltd

Wadebridge House

16 Wadebridge Square

Poundbury, Dorset DT1 3AQ

United Kingdom

Email: hello@catnipcomms.com

14. **General**

You may not transfer any of your rights under this Privacy & Cookies Policy to any other person. Anyone under the age of 18 should not use Our Site. In the event someone under the age of 18 uses Our Site and accepts this Privacy & Cookies Policy without consent from someone who has parental responsibility, we shall not be liable for any breach of the Data Protection Legislation relating to the personal data we collect as a result of such use. We may transfer our rights under this Privacy & Cookies Policy where we reasonably believe your rights will not be affected.

If any court or competent authority finds that any provision of this Privacy & Cookies Policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this Privacy & Cookies Policy will not be affected.

Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

This Privacy & Cookies Policy will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

15. **Changes to this Privacy & Cookies Policy**

We may change this Privacy & Cookies 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.

We recommend that you check this page regularly to keep up-to-date. This Privacy & Cookies Policy was last updated on 28 April 2022