



# Reflow Ltd

## Privacy Policy Notice

Revised May 2018

This privacy policy notice is for Reflow Ltd, and governs the privacy of those who share data with us. The purpose of this policy is to explain to you how we control, process, handle and protect your personal information while browsing or using this website, interacting with Reflow online, via telephone or face to face including your rights under current laws and regulations. If you do not agree to the following policy you may wish to cease viewing / using this website.

### **Policy key definitions:**

- "I", "our", "us", or "we" refer to the business, Reflow Ltd.
- "you", "the user" refer to the person(s) using this website or interacting with us.
- GDPR means General Data Protection Act.
- PECR means Privacy & Electronic Communications Regulation.
- ICO means Information Commissioner's Office.
- Cookies mean small files stored on a users computer or device.
- Data, personal information is data related to employees, representatives of customers or suppliers and is collected and used by Reflow in order to carry out our legitimate business operations. The data may include personal data such as the first, middle and last name, date of birth, national insurance number, bank account number and sort code, email address, home address, company name, financial data.

Reflow Ltd – Unit 2 Spring Lane North – Malvern – Worcs – WR14 1BU

Tel: 01684 578849 - e-mail: [info@reflow.co.uk](mailto:info@reflow.co.uk) - web: [www.reflow.co.uk](http://www.reflow.co.uk)

Registered in England & Wales No. 6361136 – Registered Office Thorneloe House Worcester WR1 1RU



## **Processing of your personal data**

Under the GDPR (General Data Protection Regulation) we control and / or process any personal information about you electronically using the following lawful bases.

- We are exempt from registration in the ICO Data Protection Register because we process personal data only for advertising, marketing and public relations.

**Lawful basis:**Legal obligation

**The reason we use this basis:** To comply with UK law.

**We process your information in the following ways:**

As required by law to administer or manage our legal administrative duties to our employees, customers and suppliers.

**Data retention period:** We will continue to process your data for a minimum of 7 years or as required by law.

**Sharing your information:** We do share your personal information with third parties and they include;

- Our accountant
- Our bank
- HMRC

**Lawful basis:**Consent

**The reason we use this basis:**

- You have provided Reflow with the information for reasonable use in performing professional services
- You have applied for employment
- You have indicated an interest in our professional services
- You have consented to a third party passing your information to us

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- Your information is in the public domain

**We process your information in the following ways:**

Reflow uses personal data to operate our business providing services and to send communications including marketing, technical data and financial information. We also process data in our CRM, email server and telephone systems. For example we may use personal data to:

- Respond to your requests and questions
- Identify individuals in our CRM or telephone
- Administer and provide our website
- Customise content you see on our website
- Communicate with you about offers, new services and reminders of our services
- Send notifications relating to our company, services, terms and conditions or your account information to you.

**Data retention period:** We will continue to process your information under this basis until you withdraw consent, it is determined your consent no longer exists or for a minimum of seven years.

**Sharing your information:**

- We do share your personal information with third parties and they include;
  - Our accountant
  - Our bank
  - HMRC or other legitimately interested government agency/body.



**Lawful basis:** Contract

**The reason we use this basis:**

Processing is necessary for the performance of a contract to which the data subject is party to.

**We process your information in the following ways:**

Reflow uses personal information within our CRM, email system, accounts package and telephones to manage customer, supplier and staff contracts.

**Data retention period:** We will continue to process your information under this basis for a minimum of seven years.

**Sharing your information:**

- We do share your personal information with third parties and they include;
  - Our accountant
  - Our bank
  - HMRC or other legitimately interested government agency/body.

**Lawful basis:** Legitimate interests

**The reason we use this basis:** Reflow have reasonable grounds to believe your data has been provided in good faith for professional communication relating to related products or services.

**We process your information in the following ways:**

Reflow uses personal information within our CRM, email system, accounts package and telephones.

**Data retention period:** We will continue to process your information under this basis for a minimum of seven years.

**Sharing your information:** We do not share this information.



## **Your individual rights**

Under the GDPR your rights are as follows.

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

You also have the right to complain to the ICO [[www.ico.org.uk](http://www.ico.org.uk)] if you feel there is a problem with the way we are handling your data.

We handle subject access requests in accordance with the GDPR.

## **Internet cookies**

We may use cookies on this website to provide you with a better user experience. We do this by placing a small text file on your device / computer hard drive to track how you use the website, to record or log whether you have seen particular messages that we display, to keep you logged into the website where applicable, to display relevant adverts or content, referred you to a third party website.



Some cookies are required to enjoy and use the full functionality of this website.

If we use cookies we will use a cookie control system which allows you to accept the use of cookies, and control which cookies are saved to your device / computer. Some cookies will be saved for specific time periods, where others may last indefinitely. Your web browser should provide you with the controls to manage and delete cookies from your device, please see your web browser options.

Cookies that we currently use are;

- None

## **Data security and protection**

We ensure the security of any personal information we hold by using secure data storage technologies and precise procedures in how we store, access and manage that information. Our methods meet the GDPR compliance requirement.

## **Sponsored links, affiliate tracking & commissions**

Our website may contain adverts, sponsored and affiliate links on some pages. These are typically served through our advertising partners; Google AdSense, eBay Partner Network, Amazon Affiliates, or are self served through our own means. We only use trusted advertising partners who each have high standards of user privacy and security. However we



do not control the actual adverts seen / displayed by our advertising partners. Our ad partners may collect data and use cookies for ad personalisation and measurement. Where ad preferences are requested as 'non-personalised' cookies may still be used for frequency capping, aggregated ad reporting and to combat fraud and abuse.

Clickable sponsored or affiliate links may be displayed as a website URL like this; [www.thetafhotel.co.uk](http://www.thetafhotel.co.uk) or as a titled text link like this: [Bed & Breakfast in Whitland](#).

Clicking on any adverts, sponsored or affiliate links may track your actions by using a cookie saved to your device. You can read more about cookies on this website above. Your actions are usually recorded as a referral from our website by this cookie. In most cases we earn a very small commission from the advertiser or advertising partner, at no cost to you, whether you make a purchase on their website or not.

We use advertising partners in these ways to help generate an income from the website, which allows us to continue our work and provide you with the best overall experience and valued information.

If you have any concerns about this we suggest you do not click on any adverts, sponsored or affiliate links found throughout the website.



## **Email marketing messages & subscription**

Under the GDPR we use the consent lawful basis for anyone subscribing to our newsletter or marketing mailing list. We only collect certain data about you, as detailed in the "Processing of your personal data" above. Any email marketing messages we send are done so through an EMS, email marketing service provider. An EMS is a third party service provider of software / applications that allows marketers to send out email marketing campaigns to a list of users. Email marketing messages that we send may contain tracking beacons / tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of data such as; times, dates, I.P addresses, opens, clicks, forwards, geographic and demographic data. Such data, within its limitations will show the activity each subscriber made for that email campaign. Any email marketing messages we send are in accordance with the GDPR and the PECR. We provide you with an easy method to withdraw your consent (unsubscribe) or manage your preferences / the information we hold about you at any time. See any marketing messages for instructions on how to unsubscribe or manage your preferences, you can also **unsubscribe from all MailChimp lists**, by following this link, otherwise contact the EMS provider.





Our EMS provider is; **not implemented**. We hold the following information about you within our EMS system;

- No data stored