

# Strathmore Partnership Ltd

## Privacy Notice

Your privacy is important to Strathmore Partnership Ltd. So, we've developed a Privacy Notice that explains how we collect, record, use and store your information. Please take a moment to familiarise yourself with our privacy practices and let us know if you have any questions.

### Who are we?

We are a Ltd Company offering a lifestyle service to private individuals.

Our contact details are:

Company: Strathmore Partnership Ltd (company number 11389962)

Website: [www.strathmorepartnership.com](http://www.strathmorepartnership.com)

Email: [support@strathmorepartnership.com](mailto:support@strathmorepartnership.com)

Tel: 0207 7078 4020

Address: 5a Lucerne Mews, London, United Kingdom, W8 4RU

### Who does this Privacy Notice apply to?

This Privacy Notice tells you what to expect when we collect personal information from you as a data subject. It applies to information we collect and process about our clients through the provision of our services.

### What personal data do we collect from you?

We may collect the following personal data from you:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.
- **Financial Data** includes bank account and payment card details.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to interact with or access our website.
- **Transaction Data** includes details about payments to and from you and other details of products and/or services you have purchased from us.

- **Usage Data** includes information about how you use our website, products and services.

We may collect any Special Categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

We do not collect any information about criminal convictions and offences.

We will collect a majority of the personal data outlined above directly from you. You may give us any of the above personal data by filling in forms or by corresponding with us by post, phone, email or otherwise.

As you interact with our website, we may also automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. For further details please see below under "How about Cookies?".

### **Why do we collect your personal data and what is our lawful basis for processing?**

Below is a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so.

- 1) To process and deliver your requests and orders including:
  - Professional fulfilment of requests placed by you or on your behalf including working with third parties on your behalf
  - To process your request through our "Let's meet" tab or "Contact Form" on our website
  - Manage payments, fees and charges
  - Collect and recover money owed to us

Our lawful basis:

- Performance of a contract with you
- Necessary for our legitimate interests (to recover debts due to us)

- 2) To manage our relationship with you which will include:
  - Notifying you about changes to our terms or Privacy Notice
  - To request feedback on our services and performance

Our lawful basis:

- Performance of a contract with you
- Necessary to comply with a legal obligation
- Necessary for our legitimate interests (to study how customers use our products/services and ensuring client satisfaction and improving our services)

- 3) To make suggestions and recommendations to you about goods or services that may be of interest to you.

Our lawful basis:

- Necessary for our legitimate interests (to develop our products/services and grow our business)
- 4) To use data analytics to improve our website, products/services, customer relationships and experiences.

Our lawful basis:

- Necessary for our legitimate interests (to keep our website updated and relevant, to monitor and improve our website and to develop our business.)

### **What do we do with this data?**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- To perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- To comply with a legal or regulatory obligation.
- To contact you by phone, email and paper communications to be able to make all the necessary arrangements for your requested goods or services on your behalf.
- To visit you if you instruct us to your home address or mutually convenient place in order to fulfil your request for goods or services.
- To carry out credit checks on you with a credit reference agency using the name and address details you have supplied and the amount of credit we are allowing you.
- To pass on your details to trusted third parties.

We do not use your information for marketing purposes.

We will never transfer your personal data outside of the European Union.

### **Who might we share your data with?**

We may have to share your personal data with the parties set out below for the purposes set out above:

- Third parties who may provide goods/services pursuant to the contract we are about to enter into or have entered into with you.
- Service providers acting as processors based who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **How about cookies?**

Cookies are small text files that are placed on your computer when you visit a website. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

Our website uses cookies. If you are concerned about security, you can modify your browser to prevent cookies being stored on your machine. You can adjust the settings on your computer to decline any cookies if you wish. This can be done within the “settings” section of your web browser. From there you can block all cookies from this website and its external serving vendors or use the cookie control system if available upon your first visit.

### **How long do we retain your data for?**

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected or for the purposes of satisfying any legal, accounting, or reporting requirements.

When assessing what retention period is appropriate for your personal data, we take into consideration:

- the requirements of our business and the Products and/or Services provided; any statutory or legal obligations;
- the purposes for which we originally collected the personal data;
- the lawful grounds on which we based our processing;
- the types of personal data we have collected;
- the amount and categories of your personal data; and
- whether the purpose of the processing could reasonably be fulfilled by other means.

### **What happens if I don't provide you with the data?**

If the provision of personal data is part of the contractual requirement between us and you there may be possible consequences of failing to provide the personal data. For example, we will be unable to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services) if we do not have the personal data requested from you. If this is the case, we will notify you at the time.

### **What are my rights?**

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

1. Right of access – You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. You have the right to request a copy of the information that we hold about you and providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data within one month of your request.
2. Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete. The information we hold will be accurate and up to date.

You can check the information that we hold about you by e-mailing us. If you find any inaccuracies we will delete or correct it promptly.

3. Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are certain general exclusions of the right to erasure. Those general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.
4. Right to restriction of processing – where certain conditions apply you may have the right to restrict processing. Those conditions are: you contest the accuracy of the personal data; processing is unlawful, but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
5. Right of portability – you have the right to have the data we hold about you transferred to another organisation. This right only applies to personal data that you have provided to us, where the processing is based on your consent or for the performance of the contract and when processing is carried out by automated means.
6. Right to object – you have the right to object to certain types of processing only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims. If you object to direct marketing we will cease to process your personal data for this purpose.

If you wish to enforce any of your rights listed above please email us or write to us using the contact details under “Who are we?”.

All of the above requests will also be forwarded on should there be a third party involved in the processing of your personal data (as identified under “Who might we share your data with?”).

### **What if I have a complaint?**

If you wish to make a complaint about how your personal data is being processed by us, or how your complaint has been handled, you have the right to lodge a complaint directly

with the supervisory authority using the contact details below. We ask that you contact us in the first instance.

UK's Supervisory Authority:

Address:

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

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

**Changes to this privacy notice**

We reserve the right to update this Privacy Notice at any time. You should check this page occasionally to ensure you are happy with any changes to this Notice. We may notify you of changes to this Notice by providing you with a new Privacy Notice when we make any substantial updates.

We may also notify you in other ways from time to time about the processing of your personal information.