

# **Privacy Policy**

*This policy was in effect as of 27th August 2020*

This privacy policy has been compiled in order to better serve those who are concerned with how their information and personal information is processed, managed and stored by Pheasant Commercial and Contractual Solutions Ltd. Additionally we will be highlighting how we collect your data and what rights we hold as a result of you agreeing to the terms laid out in this policy.

For the purposes of this policy we will be referring to ourselves throughout, as either; Pheasant Commercial and Contractual Solutions Ltd, Pheasant Solutions, Us, Our, We or The Company. With regards to our customers and potential customers we will be referring to them as; You, I, Yours and The Customer.

## **1. What Information Do We Collect?**

When purchasing, registering, subscribing to our site, where necessary and appropriate, you may be asked or required to enter your name, email address, mailing address, credit card information or any other appropriate and relevant details to help you and us with your experience.

## **2. How Do We Collect The Data?**

We collect information and personal information from you when you sign-up to our services, register to our site, place an order, subscribe to our newsletters and emails, fill out a form or enter any other information on our site.

## **3. How Do We Use Your Information?**

Pheasant Commercial and Contractual Solutions Ltd may use your personal information in any or all of the following ways:

- To personalise user experiences, which could allow us to deliver the type of content and product offerings for which you are more / most interested in.
- To improve our website in order to better serve you.
- To allow us to better service you such as; by responding to your customer service requests.
- To administer a contest, promotional material, survey, and other site features.
- To quickly process your transactions.
- To send periodic emails regarding your order, news, updates or other products and services.

## **4. How Do We Protect Visitor Info?**

in instances where disclosing your personal information is required by any regulatory body or authority as well as any law enforcement authority. In order to protect the integrity of the business, our customers and the community, we will comply and provide all requested documentation, so long as the request is authentic.

## **5. Do We Use “Cookies”?**

Yes we do.

Cookies are very small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you authorise and agree) that enables the site's or service provider's systems to recognise your browser, therefore allowing us to capture and retain certain information.

For instance, we use cookies to help us understand your preferences based on previous or current site history and activity, which enables us to provide you with improved services. We also use cookies to help us compile data about site traffic, site interaction and experience so that we can offer a better site experience and service.

We use cookies to:

- Help remember and process the items in the shopping cart.
- Understand and save user's preferences for future visits.
- Compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. We may also use trusted third party services that track this information on our behalf.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser (like google chrome) settings.

If you disable cookies, some features will be disabled as a result, therefore, It will turn off some of the features that make your site experience more efficient as well as potentially impacting the functionality of some of our services.

## **6. How Can You Opt-out / Remove / Modify My Information That Is On Our Records?**

You have the right to request to have your information removed from our files and database. Simply contact us on the details found in section 14.

Please be aware, we may have to maintain certain information about any individual sales transaction in order to complete that transaction and for our financial record keeping purposes.

## **7. Third-Party Disclosures**

We do not sell, trade, or otherwise transfer to outside parties any of your personally identifiable information under any circumstance, unless we provide you with advance notice. However, this does not include website hosting partners and other parties who assist us in operation of our website, and in conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property, or safety.

Please note, any non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

## **8. Third-Party Links**

Occasionally and at our discretion, we may include or offer the use or purchase of third party products or services on our website. These third parties have separate and independent privacy policies and therefore we hold no responsibility or liability for the content, activities and products or services linked from our site. We will however, in the interest of our business carry out any necessary due diligence to ensure that there is a suitable level of ethical practices in place to ensure the safety and integrity of our business and our customers. Therefore we always welcome any feedback about these sites.

## **9. Transfer Of Your Personal Data**

Your information, including personal information, may be transferred to — and maintained on — computers located outside of your county or country or other governmental jurisdiction where the data protection laws may differ but still comply with the EU's General Data Protection Regulations (GDPR).

We will take all steps necessary to ensure that your data is always treated securely and under the strictest of confidence, in accordance with this Privacy Policy and no transfer of your personal

information will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

## **10. Disclosure Of Your Personal Data**

If Pheasant Commercial and Contractual Solutions Ltd is involved in a merger, acquisition or asset sale, that results in your personal information being transferred. We will provide you with proper notice before your personal information is transferred and becomes subject to a different Privacy Policy.

Under certain circumstances, we may be required to disclose your personal information if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

## **11. Retention Of Your Personal Data**

We will retain your personal information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

## **12. Information Regarding Data Protection Act (DPA) And The General Data Protection Regulations And Your Rights**

As of the 25th May 2018, the Data Protection Act (DPA) was superseded by the General Data Protection Regulations. As a business still trading we strictly abide by the regulations put in place, for our protection and equally importantly that of our customers and potential customers. As such for the purposes of this policy, in this section we have highlighted the data controller, the principles and your rights.

### **12.1. Data Controller**

For the purposes of this policy we are the data controller, for the personal information collected and stored by Pheasant Commercial and Contractual Solutions Ltd. We do not take responsibility or control any of your data that is collected, stored and held by any third-parties we work with or use.

### **12.2. Data Protection Principles according to GDPR**

Pheasant Commercial and Contractual Solutions Ltd has adopted the following principles to govern its collection and processing of Personal Data in accordance with GDPR policy which came into effect on 25th May 2018:

- Personal Data shall be processed lawfully, fairly, and in a transparent manner.
- The Personal Data collected will only be those specifically required to fulfil the products and services that Pheasant Commercial and Contractual Solutions Ltd provide and any such data collected will only be processed for that purpose.
- Personal Data shall only be retained for as long as it is required to fulfil any contractual requirements, or to provide statistics to Pheasant Commercial and Contractual Solutions Ltd.
- Personal Data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are collected and/or processed. Personal Data shall be accurate and, where necessary, kept up to date.
- The Data Subject has the right to request from Pheasant Commercial and Contractual Solutions Ltd access to and rectification or erasure of their personal data, to object to or request restriction of processing concerning the data, or to the right to data portability. In each case such a request must be put in writing..

The Data Subject has the right to make a complaint directly to a supervisory authority within their own country. Pheasant Commercial and Contractual Solutions Ltd Data Protection compliance is supervised by:

Ian Pheasant - Director  
37 Lingfield Cl, Netherton, Bootle L30 1BB

- Personal Data shall only be processed based on the legal basis except where such interests are overridden by the fundamental rights and freedoms of the Data Subject which will always take precedent. If the Data Subject has provided specific additional Consent to the processing, then such consent may be withdrawn at any time.
- Pheasant Commercial and Contractual Solutions Ltd will not use personal data for any monitoring or profiling activity or process, and will not adopt any automated decision making processes.

### **12.3. Your Rights**

Under chapter 3 of the GDPR each Data Subject has eight rights which they have read and been aware of through this policy. Your rights consist of the following eight items:

- **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**
- **Rights in relation to automated decision making and profiling**

## **13. Service Providers**

We employ the use of third party companies and individuals to facilitate our Website ("Service Providers"), in order to provide our Website on our behalf, to perform Website-related services or to assist us in analysing how our Website is used. These third-parties have access to your personal information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

**13.1. Facebook And Other Social Media** - As a business we employ social media in order to promote our services, efforts, ethics and communication with the community at large. Whilst we do not ever display personal information of any kind, we are aware that all social media platforms have their own privacy policies and therefore we abide by those rulings. Furthermore, you should be aware that all social media platforms will collect your data and use it in accordance with their policies. For more information on their policies please go to:

Facebook - <https://www.facebook.com/about/privacy>

Instagram - <https://help.instagram.com/519522125107875>

Twitter - <https://twitter.com/settings/account/personalization>

Youtube - <https://policies.google.com/privacy?hl=en-GB&gl=uk>

**13.2. Analytics and Auditing** - We as a business use various analytic tools provided by other businesses, specifically, Google Analytics which is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network.

You can opt-out of having your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents Google Analytics JavaScript

(ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <http://www.google.com/intl/en/policies/privacy/>.

**13.3. Payment Processor** - We as a business take payments as we provide paid products and/or services on our Website. In that case, we use third-party services for payment processing (e.g. payment processors). As a business we do not collect or store your payment card details. That information is provided directly to our third-party payment processors, whose use of your payment details are declared within the contents of their own privacy policies. As a business we use and hold the right to introduce and use the following payment processing services:

Stripe - <https://stripe.com/gb/privacy>

Klarna - [https://cdn.klarna.com/1.0/shared/content/legal/terms/0/en\\_gb/privacy](https://cdn.klarna.com/1.0/shared/content/legal/terms/0/en_gb/privacy)

Apple Pay - <https://www.apple.com/uk/legal/privacy/en-ww/>

Google Pay -

[https://payments.google.com/payments/apis-secure/u/0/get\\_legal\\_document?ldo=0&ldt=privacy\\_notice&ldl=en-GB](https://payments.google.com/payments/apis-secure/u/0/get_legal_document?ldo=0&ldt=privacy_notice&ldl=en-GB)

Visa - <https://www.visa.co.uk/legal/global-privacy-notice.html>

Mastercard - <https://www.mastercard.com/en-ke/about-mastercard/what-we-do/privacy.html>

PayPal - <https://www.paypal.com/uk/webapps/mpp/ua/privacy-full>

Please note, that we only work with third parties payment processors that are controlled and regulated by the financial conduct authority (FCA).

We as a business cannot be held responsible for any changes in policy, improper actions, illegal activity or indiscretions that any of the service providers we use. As these are separate business to ours and we only use these services to help aid us in the performance and promotion of our business. If we are to be alerted or identify any indiscretion taking place from the service providers we use we will notify you immediately, as well as the necessary authorities and regulatory bodies.

## 14. Contacting Us

For those that would like to get in touch with Pheasant Commercial and Contractual Solutions Ltd and the data controller, you can simply write to:

Ian Pheasant - Director  
37 Lingfield Cl, Netherton, Bootle L30 1BB

Alternatively you can email us at [ian@pheasantsolutions.co.uk](mailto:ian@pheasantsolutions.co.uk) or call us on [07834 221362](tel:07834221362).

All requests are reviewed and taken extremely seriously and with absolutely confidentiality, We aim to respond within 72 hours.