



Revision 2.0  
Created 14/12/2022

# PRIVACY POLICY

This is the general template for use on policies, procedures, and Terms & Conditions.

## 1. INTRODUCTION:

- 1.1 22live Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, and only collect and use your personal data as described in this Privacy Policy. Any personal data we collect will only be used as permitted by law. Please read this Privacy Policy carefully and ensure that you understand it.

## 2. INFORMATION ABOUT 22LIVE LIMITED

This Site is owned and operated by 22live Limited, a limited company, registered in England under company number 13771164.

- Registered address: Unit 9 Colemeadow Road, North Moons Moat, Redditch B98 9PA
- VAT number: 40471139
- Data Protection Officer: Alex Penn
- Email address: alex.penn@22live.com

## 3. DEFINITIONS AND INTERPRETATION

**“Account”** means an account required to access and/or use certain areas and features of Our Site;

**“Cookie”** means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out below.

**“Cookie Law”** means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003

## 4. WHAT DOES THIS POLICY COVER?

This Privacy Policy applies only to your use of our Site. 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 and we advise you to check the privacy policies of any such websites before providing any data to them.

## 5. WHAT IS PERSONAL DATA?

- 5.1 Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, “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’.

5.2 Personal data is, in simpler terms, 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.

## 6. WHAT ARE MY RIGHTS?

- 6.1 Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:
- 6.1.1 The right to be informed about collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 10.
  - 6.1.2 The right to access the personal data we hold about you. Part 9 will tell you how to do this.
  - 6.1.3 The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 10 to find out more.
  - 6.1.4 The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 10 to find out more.
  - 6.1.5 The right to restrict (i.e. prevent) the processing of your personal data.
  - 6.1.6 The right to object to us using your personal data for a particular purpose or purposes.
  - 6.1.7 The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
  - 6.1.8 The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
  - 6.1.9 Rights relating to automated decision-making and profiling. We do not use your personal data in this way.
- 6.2 For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 10.
- 6.3 It is important that your personal data is kept 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.
- 6.4 Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.
- 6.5 If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns however, so please contact us first, using the details in Part 10.

## 7. WHAT DATA DO YOU COLLECT AND HOW?

- 7.1 Depending upon your use of our Site, we may collect and hold some or all of the personal and non-personal data set out below. We do not collect any 'special category' or 'sensitive' personal data.
- 7.1.1 your name, title and business contact information including addresses, telephone numbers and email addresses;
  - 7.1.2 Information generated by visiting our website or engaging with us on social media:
  - 7.1.3 IP addresses, social handles or usernames
- 7.2 If you send us an email, we may collect your name, your email address, and any other information which you choose to give us. For the purposes of the Data Protection Legislation, we are the data controller responsible for such personal data.
- 7.3 The lawful basis under the Data Protection Legislation that allows us to use such information is article 6(1)(f) of the UK GDPR which allows us to process personal data when it is necessary for the purposes of our legitimate interests, in this case, the proper operation and functionality of our Site. If you contact us as described above, you will be required to consent to our use of your personal data to contact you. In

this case, our lawful basis for using your personal data will be article 6(1)(a) of the UK GDPR, which allows us to use your personal data with your consent for a particular purpose or purposes.

## 8. HOW DO YOU USE MY PERSONAL DATA?

- 8.1 Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table below describes how we may use your personal data, and our lawful bases for doing so
- 8.2 Where we collect any personal data, it will be processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the Data Protection Legislation at all times. For more details on security see Part 7, below.
- 8.3 As stated above, we do not generally collect any personal data directly from you, but if you contact us and we obtain your personal details from your email, we may use them to respond to your email. The other technical data referred to above is necessary for the technical operation of our Site and will not normally be used in any way to personally identify you.
- 8.4 No personal data will be retained for any longer than is necessary.
- 8.5 We will not share any of your personal data with any third parties for any purposes other than storage on an email and/or web hosting server.

Purpose / Activity	Type of Data	Lawful basis for processing
To process and carry out the delivery of services to clients under contract	Identity Contact	Performance of a contract
To ensure administration of our contractual services to clients, effective monitoring of the service provided and maintaining up to date records	Contact Identity Usage	Performance of a contract Legitimate interests
To make suggestions and recommendations to you about services that may be of interest	Contact Usage Marketing and Communications	Legitimate interests (to develop services and grow our business)

## 9. HOW AND WHERE DO YOU STORE MY DATA?

- 9.1 We will only store your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.
- 9.2 Personal data security is essential to us, and to protect personal data, we will limit access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;

## 10. DO YOU SHARE MY PERSONAL DATA?

- 10.1 We contract with the following third parties for hosting and data storage purposes:
- Squarespace – for website hosting: [Privacy Policy](#)
  - GoDaddy – for domain services – they do not hold any personal data.
- 10.2 If any of your personal data is transferred to a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 7.
- 10.3 If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy (i.e. to communicate with you).]
- 10.4 In some limited circumstances, 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.

## 11. HOW CAN I ACCESS MY PERSONAL DATA?

- 11.1 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”.
- 11.2 All subject access requests should be made in writing and sent to the email address shown in Part 10. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.
- 11.3 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.
- 11.4 We will respond to your subject access request within 4 weeks 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 will be kept fully informed of our progress.

## 12. HOW DO YOU USE COOKIES

- 12.1 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 have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.
- 12.2 All Cookies used by and on Our Site are used in accordance with current Cookie Law.
- 12.3 Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.
- 12.4 In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- 12.5 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.
- 12.6 It is 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 are 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 use the following details: Email address: alex.penn@22live.com.

## 14. CHANGES TO THIS PRIVACY POLICY

- 14.1 We may change this Privacy 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.

14.2 Any changes will be immediately posted on our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our Site following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 03 January 2023.

*This Policy will be reviewed annually and updated as necessary. The management team endorses this policy and is fully committed to its implementation.*

Name:	Spencer Beard	Position:	Managing Director
Signature:		Date:	01/0/2023
Issue No	2.0	Date for Review:	January 2024

Amendments from previous	01/0/2023 – Updated with new company details : address, company number, website and SJB taking MD responsibilities
Other comments	