

## Website Privacy Notice

Feltons Limited respects your privacy and is committed to protecting your personal data. This privacy notice will tell you how we look after your personal data when you visit our website (no matter from where you visit the site). It will also tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively you can download a pdf version of the policy [here](#). Please also use the [Glossary](#) to understand the meaning of some of the terms we have used in this privacy notice.

### Important information and who we are

#### **Purpose of this privacy notice**

This privacy notice aims to give you information on how Feltons (see [About Us](#)) collects and processes your personal data through your use of this website, including any data you may provide through this website when you fill in our contact form or email us via the website.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

#### **Controller:**

Feltons is the data controller and responsible for your personal data, (otherwise referred to as "we", "us" or "our" in this privacy notice). If you have any questions about this privacy notice, including any requests to exercise your legal rights regarding data you share with us via our contact form, for example, please contact [richmond@fpca.co.uk](mailto:richmond@fpca.co.uk).

#### **Full name of legal entity:**

Feltons Limited and Pumphrey Dasalo Limited (both trading as Feltons)

#### **Email address:**

[richmond@fpca.co.uk](mailto:richmond@fpca.co.uk)

#### **Postal address:**

1 The Green, Richmond, Surrey, TW9 1PL

#### **Telephone number:**

+44(0)20 8940 0963

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please [contact us](#) in the first instance.

## **Changes to the privacy notice and your duty to inform us of changes**

This version was last updated on 12 April 2018. The data protection law in the UK will change on 25 May 2018. Although this privacy notice sets out most of your rights under the new laws, we may not yet be able to respond to some of your requests (for example, a request for the transfer of your personal data) until May 2018 as we are still in the process of implementing the requirements. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **Third-party links**

This website may include links to third-party websites. Clicking on those links may allow third parties to collect or share data about you, (such as your IP address). We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which you will have entered on the contact form.

## **How is your personal data collected on our website**

We only collect data through the contact form which generates an email to us.

## **How we use your personal 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:

- Where we need to perform any 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.
- Where we need to comply with a legal or regulatory obligation.

## **Purposes for which we will use your personal data**

We have set out below 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. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To respond to your enquiry	Contact details as provided	Performance of a potential contract with you
If you become a client		You will receive an Engagement Letter covering Data Protection Issues

### **Third-party marketing**

If we were to participate in any affiliate or third-party marketing, we will get your express opt-in consent before we share your personal data with any company outside Feltons for marketing purposes.

### **Cookies**

We do not use cookies.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with our original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Disclosures of your personal data**

We do not collect personal data from the website other than that entered by you on the contact form.

## International transfers

We do not transfer your personal data collected from the contact form outside the European Economic Area (EEA).

## Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## Data retention

### **How long will you use my personal data for?**

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

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Personal data will be held for up to seven years to meet statutory obligations. Where these are not relevant, for example, where contact is made and no engagement follows, data will be destroyed within one year.

## Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These are listed below.

### **No fee is usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## You have the right to:

- **Request access to your personal data (commonly known as a "data subject access request")**  
This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you**  
This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data**  
This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data**  
Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing of your personal data**  
 This enables you to ask us to suspend the processing of your personal data in the following scenarios:

  - if you want us to establish the data's accuracy;
  - where our use of the data is unlawful but you do not want us to erase it;
  - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims;
  - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
  
- **Request the transfer of your personal data to you or to a third party**  
 We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
  
- **Withdraw consent at any time where we are relying on consent to process your personal data**  
 However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please [contact us](#).

## Glossary

### LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.