

## **JUDGE JULES LTD.** **PRIVACY POLICY**

This privacy notice provides you with details of how Judge Jules Ltd. or “Jules” as is referred to in this document collects and processes personal data when either visiting our site [www.judgejules.co.uk](http://www.judgejules.co.uk) or becoming a prospect or client, or becoming an employee of the company.

### **Contact Details;**

- Full name of legal entity: Judge Jules Ltd.
- Email address: [contact@freshdjs.co.uk](mailto:contact@freshdjs.co.uk)
- Postal address: 1 Brookfield Yard, Sheffield S7 1DY
- If you are not happy with any aspect of how we collect and use your data, you have the right to complain 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 be grateful if you could contact us first if you have a complaint so that we can try to resolve it for you.
- It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at [contact@freshdjs.co.uk](mailto:contact@freshdjs.co.uk)

### **What Information Does Jules Collect About You?**

Personal data means any information capable of identifying an individual. It does not include anonymised data. We may process certain types of personal data about you as follows:

- **Identity Data** may include your first name, maiden name, last name, username, marital status, title, date of birth and gender.
- **Contact Data** may include your billing address, delivery address, email address and telephone numbers.
- **Financial Data** may include your bank account and payment card details.
- **Transaction Data** may include details about payments between us and other details of purchases made by you.
- **Technical Data** may include your login data, internet protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access this site.
- **Marketing and Communications Data** may include your preferences in receiving marketing communications from us and our third parties and your communication preferences.

### **Sensitive Data;**

We do not collect any Sensitive Data about you. Sensitive data refers to data that 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.

### **How Jules Collects Your Personal Data;**

We collect data about you through a variety of different methods including:

**Direct interactions:** You may provide data by filling in forms on our website (or otherwise) or by communicating with us by post, phone, email or otherwise, including when you:

- Become an employee;
- Request a quote for our services;
- Come on board as a client of our services;
- Subscribe to our services or newsletter publications;
- Request resources or marketing be sent to you;
- Give us feedback.

**Automated technologies or interactions:** As you use our site, we may automatically collect Technical Data about your equipment, browsing actions and usage patterns. We collect this data by using cookies, server logs and similar technologies. Please see our cookie policy below for further details.

### **How Jules Uses Your Personal Data;**

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where we need to perform the contract between us.
- 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.

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by emailing us at [contact@freshdjs.co.uk](mailto:contact@freshdjs.co.uk)

### **Why Jules Processes Personal Data;**

We intend to use your personal data on legal grounds on which we will process such data. 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 email us at [contact@freshdjs.co.uk](mailto:contact@freshdjs.co.uk) if you need details about the specific legal ground.

1. To register you as a new customer.
2. To process and deliver our service including:
  - (a) Manage payments, fees and charges.
  - (b) Collect and recover money owed to us.
3. To manage our relationship with you which will include:
  - (a) Notifying you about changes to our terms or privacy policy.
  - (b) Asking you to leave a review or take a survey.
4. To manage a legitimate interest while in the recruitment process for job applicants and new employees.
5. To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).
6. To deliver relevant content and advertisements to you and measure and understand the effectiveness of our advertising.
7. To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.
8. To make suggestions and recommendations to you about goods or services that may be of interest to you.

### **Marketing Communications;**

1. You will receive marketing communications from us if you have:
  - requested information from us or purchased goods or services from us; or
  - if you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications; and
  - in each case, you have not opted out of receiving that marketing.
2. We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.
3. You can ask us or third parties to stop sending you marketing messages at any time by clicking on one of the unsubscribe buttons that are on all of our marketing emails OR by emailing us at [contact@freshdjs.co.uk](mailto:contact@freshdjs.co.uk) at any time.
4. Where you opt out of receiving our marketing communications, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

### **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 the original purpose. If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

### **Disclosures Of Your Personal Data To Others;**

- Your data may be shared internally, we may have to share your personal data with the parties set out below:
- HM Revenue & Customs – Government.
- SAGE – Accounting Software.
- We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

#### **International Transfers;**

1. Countries outside of the European Economic Area (**EEA**) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria.
2. Some of our third parties service providers are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA.
3. Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is implemented:
  - We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or
  - Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
  - Where we use providers based in the United States, we may transfer data to them if they are part of the EU-US Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.
4. If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

#### **Data Security;**

1. MacAfee is installed on all PC's and laptops as appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.
2. Your data is stored on our hosted area with Keytime Accounting Software.
3. We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
4. Procedures are in place 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.

#### **Links To Other Website;**

Our website and newsletters may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

#### **Data Retention;**

1. 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.
2. 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.
3. By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.
4. In some circumstances you can ask us to delete your data: see below for further information.
5. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

#### **Your Legal Rights;**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require us to change incorrect or incomplete data;
- require us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where we are relying on our legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please email [contact@freshdjs.co.uk](mailto:contact@freshdjs.co.uk) . If you believe that we have not complied with your data protection rights, you can complain to the Information Commissioner. More information is available at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights> 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. 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.

### **Cookies;**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.