

Privacy Policy

Please read my Privacy Policy.

I am Timothy Holt. Protecting your privacy is really important to me. I only use your information where I have a legal basis to do so. This Privacy Policy will help you understand what information I collect, how I use it and what choices you have when you use my Website ("Website"), use my services and buy from me (the "Services").

You should also read my **Terms of Use** which set out the contract between you and me.

Who decides how your information is used?

I, Timothy Holt, am the data controller responsible for making decisions about how I use your personal information. If you have any questions or comments on this policy, you can:

- Email me at: **info@timothyholt.co.uk**.

The information I collect about you and how I use it

This Privacy Policy covers my use of any information that can or could be used to identify you ("Personal Data"). It does not cover information which cannot be used to identify you ("Anonymous Data").

I need to collect and use certain Personal Data to provide the Services to you and fulfil the promises I make to you in the **Terms of Use**:

When you use my Services you will give me Personal Data voluntarily by providing it to me, for example when you hire and/or use my services. I will collect and use that information in order to authenticate you when you register an interest and use the Services, to make sure you are eligible and able to receive the Services, and so that you receive the Services. That information includes your name, country of residency and email address to use on my Services.

You must have your name, country of residency and email address to use my Services. As such, the Personal Data I collect also depends on which Services you require.

You will also give me Personal Data when you enter a promotion, survey or communicate with me. Depending on which of these Services you use, that may include your name, country of residency and email address. I use that information to fulfil those Services to you and to provide related customer support to you.

In addition, I have and rely on a legitimate interest in using your Personal Data as follows:

- Using your IP address, browser type, operating system, the web page you were visiting before accessing my Services, the pages of my Services which you browsed or the features you used, and the time spent on those pages or features, the links on my Services that you click on, device identifiers, as well as actions you take during the use of my Services and how.
- Using your contact information, namely your email address in order to communicate with you to provide technical and customer support.
- Using your email address and device information in order to share updates and news about the Services with you by email. You can unsubscribe from these at any time through contacting me directly [here](#).
- To offer new or additional features for my Services.
- To carry out measures and to ensure that you are complying with my **Terms of Use**.
- To make legal or regulatory disclosures.

I will only use your Personal Data to do the following if I have your consent:

- Send you marketing materials by email. You can unsubscribe from these at any time through contacting me directly [here](#).

I also rely on your consent where I use cookies or similar technologies. Please see my **Cookies Policy** for more information about how I use them. Insofar as cookies collect Personal Data, I will process it only based on your explicit consent, in anonymised form, or under a pseudonym.

While you may disable the usage of cookies through your browser settings, I currently do not respond to a "Do Not Track" signal in the HTTP header from your browser due to the lack of industry standard on how to interpret that signal.

Who I share information with

I will not share any Personal Data that I have collected from or regarding you except as described below:

Information Shared with my Services Providers. I engage with third party service providers to work with me to administer and provide the Services. As part of that they will process your Personal Data on my behalf. These third party service providers have access to your Personal Data only for the purpose of performing services on my behalf, in compliance with this Privacy Policy, and I will make sure each one is contractually obliged not to disclose or use your Personal Data for any

other purpose. The service providers I use help me to:

- run, operate and maintain my Services through third party platform and software tools;
- provide and deliver your desired merchandise through third party platform and software tools;
- run email campaigns;
- perform marketing analytics;
- administer promotions;
- provide technical and customer support.

Information Shared with Third Parties. I share Anonymous Data with third parties for industry and market analysis. I may share Personal Data with my third-party publishing partners for their direct marketing purposes only if I have your express permission. I do not share Personal Data with any other third parties for their direct marketing purposes.

Information Disclosed for my Protection and the Protection of Others. I cooperate with government and law enforcement officials or private parties to enforce and comply with the law. I only share information about you to government or law enforcement officials or private parties when I reasonably believe necessary or appropriate: (a) to respond to claims, legal process (including subpoenas and warrants); (b) to protect my property, rights, and safety and the property, rights, and safety of a third party or the public in general; and (c) to investigate and stop any activity that I consider illegal, unethical, or legally actionable.

How your personal data is transferred

I operate my Services nationally and internationally. Your Personal Data will be transferred and stored nationally, England, for the purposes outlined in this Privacy Policy. The data protection laws in internationally countries may not be the same as in your national country.

If I transfer your Personal Data from the European Economic Area (EEA) to other countries, including the USA, I ensure that a similar degree of protection is provided to your Personal Data as within the EEA by ensuring that at least one of the following safeguards is implemented:

- The country that your Personal Data is transferred to is a country that the European Commission has deemed to provide an adequate level of protection for Personal Data as the EEA.
- I use specific contracts approved by the European Commission which give Personal Data the same protection as it has in Europe when I engage with service providers.
- Where I engage with service providers in the USA, they are part of the EU-US Privacy Shield, which requires them to provide the same protection of

your Personal Data as it has in the EEA.

How I keep your Personal Data safe

I have appropriate security measures in place to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, improperly altered or disclosed. I will also limit access to your Personal Data to agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on my instructions, and they are subject to a duty of confidentiality. I 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 I are legally required to do so.

How long I will keep your Personal Data

I keep your Personal Data for as long as I need to provide the Services to you and fulfil the purposes set out in this Privacy Policy. This is also the case for anyone that I share your information with and who carry out services on my behalf.

When I no longer need to use your Personal Data and there is no need for me to keep it to comply with my legal or regulatory obligations, I will either remove it from my systems or anonymise it so that it can no longer be associated with you.

Your rights and choices

You have certain rights in relation to your Personal Data. In order to exercise these rights, please contact me at:

Email: info@timothyholt.co.uk.

If you are a user based in the EEA (or in any country that mandates similar rights), you can:

- Request access to the Personal Data I hold on you.

Delete or correct your Personal Data. The easiest way to update your information is to contact me directly [here](#).

Object to me processing your Personal Data. Some of the Personal Data I hold is necessary for me to provide the Services to you and fulfil the promises I make to you in the [Terms of Use](#).

Ask me to stop using your Personal Data, including for marketing and promotional purposes (but be aware that sometimes I will need to use your Personal Data in order for you to use the Services).

Have your Personal Data transferred to another organisation or company (where it is technically feasible).

Complain to a regulator. I would appreciate the chance to deal with your concerns directly so I would prefer you to contact me first. However, if you're based in the EEA and believe that I have not complied with data protection laws, you can complain to my regulator, the UK Information Commissioner's Office, or with your local supervisory authority.

The law provides exceptions to these rights in certain circumstances. Where you cannot exercise one of these rights due to such an exception, I will explain to you why.

I offer you choices regarding the collection, use, and sharing of your Personal Data and I will respect the choices you make. Please note that if you decide not to provide me with the Personal Data that I request, you may not be able to access all of the features of the Services.

I aim to provide the information or complete the outcome you request within 30 days.

Changes to this Privacy Policy

Any Personal Data that I collect is covered by the Privacy Policy in effect at the time such information is collected. I may make changes to this Privacy Policy from time to time. You will be given reasonable notice of any material change.

Third Party Service

In using my Services, you may access links to websites and services that are owned or operated by third parties (each, a "Third Party Service"). Any information that you provide on or to a Third Party Service or that is collected by a Third Party Service is provided directly to the owner or operator of the Third Party Service and is subject to the owner's or operator's privacy policy. I am not responsible for the content, privacy, or security practices and policies of any Third Party Service. To protect your information, I recommend that you carefully review the privacy policies of all Third Party Service that you access.

Last updated: **June 2020**.