### Privacy Policy – Template for Stores

Maintaining your privacy is really important to us. You entrust us with your information, and we take that responsibility seriously.

We may modify or update this Privacy Policy from time to time to reflect the changes in our business and practices, and so you should review this page periodically. When we change the policy in a material manner we will let you know and update the 'last updated' header as below.

This Privacy Policy was last amended on [enter date]

This policy was last updated on [enter date] in line with GDPR requirements. It may be updated in the future and we will post the new version here on our website. We will never deviate from our overall philosophy of maintaining your privacy, though.

#### 1. General Information

[your store name] ("we", "us", "our") take security and privacy seriously. This Privacy Policy explains how we collect, store and use personal data when you browse [your domain name] or otherwise provide your personal data to us. Please read this Privacy Policy carefully to understand how we will treat your personal data.

### 2. What information we collect about you

## Your personal data

When we say your "personal data", we mean any information that identifies any person that you provide to us.

Your "personal data" may also be contained in information that we collect about you in connection with your order or otherwise interact with us for example by electronic mail.

When it comes to your personal data, we comply with our obligations under the General Data Protection Regulation and any other applicable data protection legislation from time to time.

**Your personal data** includes the information you provide, on the [your domain name] website (including any forms you complete), or during an electronic mail enquiry about you.

Examples of this personal data include your name, your email address, address including postcode which you provide to us when you set up an account and subsequently amend in the My Account section when you go to checkout; and any correspondence when you contact us.

We do not knowingly collect or solicit any personal data from anyone under the age of sixteen or knowingly allow such persons to purchase goods from us. [your domain name] is not directed at children under the age of sixteen. In the event that we learn that we have collected personal data from a child under age sixteen without verification of parental consent, we will delete that information as quickly as possible.

**Information we collect** - We collect information about your website usage, to improve our service and to understand trends to enhance and customize our website. Some of this data may be "personal data", where it identifies a person. Here's the information that we collect and how we use it:

- We monitor patterns of usage, such as abandoned cart data, so we can understand how what people are interesting in buying from [your store name] to develop and improve our products and understand customer behaviour.
- [delete this paragraph if you DO NOT use third-party apps to track customer behaviour/cookies] We monitor traffic information, including things like page visits, email clicks, referring sites. We use this information to improve our website, advertising, promotions, and to understand customer purchasing behaviour. Please see Section 11: Use of Cookies below regarding Cookies.
- [my store name] does not store any credit card data. When payments are processed via credit card, [your store name] uses third-party vendors that are PCI-DSS compliant. At no point does [your store name] have access to your credit card information. For further information on how we meet industry standards for credit card information security visit https://freewebstore.com/PCI\_compliance.html.

#### 3. How we use the information we collect

We use your personal data for legitimate business reasons, for example email you when your order has been received. It will also enable us to contact you by email, fax, post, SMS, social media or telephone where necessary concerning [your store name] or an order you have placed; to record your personal preferences; to personalize our services to you (such as by pre-populating fields to make it easier for you to provide information when you return to the [your store name]. It will also enable us to produce reports you request as part of the services we provide.

Contacting you for Marketing Purposes - We may use your personal data to contact you by email, fax, post, SMS, social media and/or telephone to let you know about our other [your store name] and/or third-party services, content, offers or product ranges which may be of interest to you. We will only use your data in this way where you have provided consent, we have legitimate business reasons for doing so, or where we are otherwise entitled by law to do so. If you would like us to stop providing you with such notifications, just contact us using the details in Section "How to Contact Us" at the end of this policy. Please note, this may take up to one working day to take effect. To stop receiving emails from [your store name] itself, you should cancel your [your store name] account or unsubscribe from our mailing list.

Cookies [freewebstore DOES NOT place Cookies on your store. If you enable third party apps to place cookies on your store you should leave this section in and provide a list of all cookies and what they do. If you do not use third party apps for Cookies, delete this section]—We may further use, or permit selected third parties to use, your personal data to enable us to track and analyse [your store name] website traffic and visitor trends, improve your browsing experience and to personalize and enhance the content and advertising we display. For further details, please see Section xxx: Use of Cookies below.

**Legal Requirements** – We may use your personal data to comply with any legal obligations to which we are subject.

### 4. Why do we use your personal data?

We collect and use your personal data for a variety of reasons. We need some data to enter into and perform our contract with you. The lawful basis for processing your personal data is Consent as you have consented to provide your personal details to us to allow us to provide a service to you. If you fail to provide such data we will be unable to provide our service to you.

Other information we collect because we have legitimate business interests, for example, in:

- Fulfilling your order and providing updates on the order.
- Understanding how our customers use our products, services and websites;
- Understanding and responding to customer feedback;
- Researching and analysing the services our customers want;
- Improving our product and better understanding how our customers use it.

### 5. How we share information we collect

Except as described in this policy, [your store name] does not divulge any personal information gathered via its services to third parties.

We may share your personal data with third parties in certain circumstances:

- We may disclose your data to any member of our group (which means our subsidiaries or our ultimate holding company);
- in the event that we, our business, or substantially all of its assets are acquired by a third party (in which case personal information about customers will be one of the transferred assets);
- if we are under a duty to disclose or share your personal in order to comply with any legal obligation; to cooperate with law enforcement officials in the investigation of unlawful activities of [your store name] website users or relating to [your store name] users; or in order to enforce or apply any contract with you; or to protect our rights, property, or safety of our employees, customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection or unlawful activity.

We also utilize a number of carefully selected third parties to help provide our services to you. Examples of these functions include website creation and hosting, email, providing marketing assistance and data analysis, data management, handling credit card transactions and providing customer service. In choosing to work with any such third parties, we will always ensure that the security policies and confidentiality arrangements of those third parties adhere to the same requirements we ourselves impose and expect, as a minimum. No ownership rights to the data will be transferred to any third party.

### Sub-processors we use:

Name	Service Provided	Link
freewebstore	eCommerce provider for website design, hosting and data storage.	https://freewebstore.com/privacy.html

Enter any third parties	
you use in connection	
with your freewebstore	
<ul> <li>such as mailchimp for</li> </ul>	
marketing, or Google if	
you use Gmail as your	
email provider etc.	

# 6. How long do we store your data for?

We only store your data for as long as necessary for the purposes of processing set out in this policy.

# **Data Retention Policy**

Category	What personal information is kept?	How long is it kept for?
Order Data	Name, email, address	[enter the length of time you store this data – please note personal information should only be kept for as long as is needed for the intention it was provided]
Invoice's	Name, email, address	[enter the length of time you store this data – please note personal information should only be kept for as long as is needed for the intention it was provided]
My Account	Name, email, address	Active until user unsubscribes or makes an individual request
Newsletter subscriptions	Email address	Active until user unsubscribes
[list any other places you store personal information relating to your customers here. If you export personal data you should ensure that the data is kept secure and in accordance with this policy.]		

# 7. How to access and control your information

You are free to change your personal details in the My Account section of your account at any time, if you have set up an account with us.

You can also ask us for a copy of your personal data that we hold. We may ask for proof of your identity before providing any information and reserve the right to refuse to provide information requested if identity is not established. Please see "Your Individual Rights" below. Generally, we will retain your personal data for a reasonable period, or for as long as the law requires.

## Your individual rights

- 1. Access to your personal data: You can ask us to confirm if we are processing your personal data and you may request a copy of your personal data by contacting us. See Section "How to Contact Us" at the end of this policy.
- 2. **Right to change or withdraw your consent:** Where you have given us consent to make use of your personal data for any of the purposes outlined in this policy, you may withdraw that consent at any time by contacting us using the details located at Section "How to Contact Us" at the end of this policy. If you wish to change your contact preferences or no longer wish to be contacted for marketing purposes, use the Unsubscribe link in the email or get in touch. See Section "How to Contact Us" at the end of this policy.
- 3. **Right to Rectification:** You may ask us to update out of date or inaccurate information we hold about you. To do so, please log on to your [your store name] account and update your information or get in touch using the details at Section "How to Contact Us" at the end of this policy.
- 4. **Right to Erasure:** In certain circumstances you may ask us to erase your Personal Data. If you would like us to erase the personal data we hold about you, please get in touch using the details at Section "How to Contact Us" at the end of this policy
- 5. **Right to Data Portability:** In certain circumstances you may ask us to provide you with the personal data that we hold about you in a structured, commonly used, machine readable form, or ask for us to send such personal data to another data controller.
- 6. **Right to object:** In certain circumstances you may object to our processing of your personal data. Please get in touch using the details at Section "How to Contact Us" at the end of this policy.
- 7. **Right to restrict processing:** You can ask us to restrict the processing of personal data we hold about you in certain circumstances. Please get in touch using the details at Section "How to Contact Us" at the end of this policy.
- 8. **Make a complaint:** You may make a complaint about our data processing activities, please contact us. See Section "How to Contact Us" at the end of this policy.
- 9. **Getting in touch:** To make enquiries and/or to exercise any of your rights in this privacy policy please contact us. See "How to Contact Us" at the end of this policy.

### 10. Use of cookies [delete this section if you do not use Cookies]

We may send a small file to your computer when you visit our website. This will enable us to identify your computer, track your behaviour on our website and to identify your particular areas of interest so as to enhance your future visits to this website. We may use cookies to collect and store personal data. We do not automatically log data or collect data you specifically provide to us. You can set your computer browser to reject cookies but this may

preclude your use of certain parts of this website. You can do this by changing your browser settings via the Help section of your browser.

For more information about the cookies we use, please see our Cookie Policy.

## 10. Data security

We take security and privacy seriously. We will endeavour to take all reasonable steps to keep your personal data secure once it has been transferred to our systems. We adopt appropriate, industry standard data collection, storage and processing practices and security measures to protect against unauthorised access, alteration, disclosure or destruction. For more information how we keep our online data safe, visit https://freewebstore.com/privacy.html.

## 11. Getting in touch

If you have any queries relating to this Privacy Policy or [your store name's] use of your personal or financial data, please contact [your email address] or alternatively write to: [your address]