Hirst Conservation Privacy Policy

Last Updated: 20 October 2017

We, Hirst Conservation Ltd, are committed to protecting and respecting your privacy. This policy, together with any other documents referred to within, sets out the basis on which we will process any personal data that we collect from you, or that you provide to us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Act 1998 (Act) / EU General Data Protection Regulation 2016 (GDPR), the data controller is Mr N. Webster, Hirst Conservation Ltd, Laughton, Sleaford, Lincolnshire, NG34 0HE

1. Individuals whose data we collect and process

- 1.1 We collect and process from a range of individuals, data for the purpose of legitimate interests as defined in Article 6.1 of the GDPR:
- 1.1.1 Visitors to our website at www.hirst-conservation.com;
- 1.1.2 Individuals who are end users of our services (End Users);
- 1.1.3 Individuals who have expressed an interest in conservation .

You will fall into one or more of these categories of individuals.

2. Information we process about Individuals

We may collect and process the following data about our Individuals:

- 2.1 Information that you provide by filling in forms on our site. This includes information
 provided at the time of subscribing to our services or requesting further services or
 information. We may also ask you for information when you communicate with the
 company;
- 2.2 If you contact us, we may keep a record of that correspondence;
- 2.3 We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them;
- 2.4 Details of any transactions you carry out with the company
- 2.5 Details of your visits to our site including, but not limited to, traffic data, location data, weblogs and other communication data and the resources that you access; and
- 2.6 Any information incidental to that listed above.

3. Information we process about End Users

- 3.1 In addition to the above, we process information on behalf of our customers about our End Users including:
- 3.1.1 Information is processed for our sole use only and is not shared with any third party.

4. Retention & Deletion

Hirst Conservation Ltd retains your information while you / your company remains an active client, unless you ask us to delete your information. If you stop being an active client we will retain your information unless you request that your details be deleted; however we will only contact you if we believe the information we intend to send to you could be of 'legitimate interest' to you or your company.

If you have signed up to receive our newsletter / requested information from us, we will retain your information until you request to be removed / deleted. Subject to the exceptions described below, Hirst Conservation Ltd deletes or anonymises your information upon request.

Subject to applicable law, Hirst Conservation Ltd may retain information after account deletion:

- 4.1 If there is an unresolved issue relating to your account, such as an outstanding invoice on your account.
- 4.2 Hirst Conservation Ltd may also retain certain information if necessary for its legitimate business interests, such as fraud prevention.
- 4.3 If we are required to by applicable law; and/or in aggregated and/or anonymised form.

5. IP addresses, cookies and similar technologies

- 5.1 We do not collect information about your computer
- 5.2 We do not obtain information about your general internet usage by using technology such as "cookies", which store information on the hard drive of your computer.

6. Where we store Individual's personal data

The data that we collect from you is retained on our servers and is not released to third parties who work for us. Such staff maybe engaged in, among other things, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

7. Security and Control of Data

- 7.1 All information you provide to us is stored on our secure servers and is accessible only by you or, if you are an End User and the Authorised User(s) of our software.
- 7.2 Please note that the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information whether collected by us or on our own, or on our customer's, behalf, we will use strict procedures and security features in order to reduce the risk of unauthorised access.

8. How we use your information

- 8.1 We use information held about you in the following ways:
- 8.1.1 To ensure that content from our site is presented in the most effective manner for you;
- 8.1.2 To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- 8.1.3 To carry out our obligations arising from any contracts entered into between you and us;
- 8.1.4 To notify you about changes to our service;
- 8.2 We do not disclose personal information about individuals to advertisers or sell your information to any other organisation for marketing purposes.

9. Sharing your information

• 9.1 We will not disclose your personal information to third parties.

10. Links to other sites

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

11. Accessing your Information

- 11.1 The Act gives you the right to access information held about you. You can find out if
 we hold any personal information about you by making a "data subject access
 request" under GDPR 2016. If we do hold information about you we will:
- 11.1.1 Give you a description of it;
- 11.1.2 Tell you why we are holding it;
- 11.1.3 Tell you who it could be disclosed to; and
- 11.1.4 Let you have a copy.
- Any formal subject access request should be made in writing to the address below.
 This will be provided FOC. However we may charge a reasonable fee for repetitive, unfounded, or excessive requests or additional copies.

12. How can you Update or Change your Information?

- 12.1 If at any time you wish to change your information, you can contact us, providing the updated information.
- 12.2 If you wish to opt-out of email notifications and communications you can contact us and we will ensure you do not receive any more communications.

13. Data Subject Rights

- 13.1 Right to Recification the right to request the controller rectify inaccurate personal data.
- 13.2 Right to Object the right to object to processing based on either public interests or legitimate interests. Processing must stop, unless the controller demonstrates compelling grounds for continuing the processing or that the processing is necessary in connection with the controller's legal rights.
 - 13.3 Right to Object to Direct Marketing
 - 13.4 Right to be Forgotten the right to have the controller erase personal data without undue delay. Contingent on the occurrence of one of the following:
 - 13.4.1 The data is no longer necessary;
 - 13.4.2 The data subject withdraws consent (and consent is the legal basis for processing);
 - 13.4.3 Controller has no overriding grounds for continuing processing against the objectification;
 - 13.4.4 Processing was unlawful;
 - 13.4.5 Erasure is necessary with EU or national law.
 - 13.5 Right to Restrict Processing the right to have the controller restrict processing if:
 - 13.5.1 The accuracy of the data is contested;
 - 13.5.2 Processing is unlawful;
 - 13.5.3 The controller no longer needs the data for its original purpose, but needs it for legal purposes;
 - 13.5.4 Erasure is pending.
 - 13.6 Right of Data Portability the right to receive a copy of your data in a commonly used machine-readable format for transfer to another controller. This will either be in .xls or .csv format.

14. Changes to Our Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on this page.

15. Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Nick Webster in writing Hirst Conservation Ltd, Laughton, Sleaford, Lincolnshire, NG34 OHE.