

# Our Privacy Policy & Cookies Policy

**Owner contact email:** drive4life@hotmail.co.uk

## Overview

In order for us to operate our business and provide our services to you, it is sometimes necessary for us to collect or process information about you. In general terms, this information will take one or more of the following forms:

- Information that you provide to us directly, such as in the situation where you complete an online form or send us a message via our website;
- Information that is automatically sent to us by your computer's internet browser when you visit our website, such as your computer's technical address (or 'IP address') or information about which particular internet browser you are using and so on;
- Information about how you use our website or our services, such as which pages you visit, how frequently you visit the site and so forth.

This privacy policy sets out the detail of what information we collect, as well as how that data is used and protected.

## Our commitment to data privacy

In terms of your use of this website, We, Drive 4 Life act in the capacity of Data Controller and comply with the GDPR best practices, and should you have any questions or concerns about the data we hold about you, we can be contacted using the information below:

**Data Controller:** Drive 4 Life

**Email correspondence:** drive4life@hotmail.co.uk

## Definition of 'personal data'

When we refer to 'personal data' we mean any information that allows us to identify you personally. Obvious examples include your name, email address, postal address etc. We will always seek to gain your explicit consent to providing this information before we

collect it from you, although this may not be the only legal basis on which we collect the data.

Other types of information, such as your computer's 'IP' address or broad geographical location do not, generally, allow us to identify you directly. However, because in their current form, European data privacy regulations (GDPR) are somewhat vague in this regard, we will cover the use of such data here also.

## Who we share data with

We operate on a strict 'need to know' basis for all data that we work with, and that is particularly true for any personal data. The only people/organisations that are granted access to personal data are:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

**Note:** Our authorised data processor has signed Data Privacy Agreements with all of the 3rd party technology suppliers above which detail our respective responsibilities for data security.

## How your data is protected

We take the security of all personal data very seriously, and that data is protected in a number of ways:

- **Access control:** access to personal data is strictly limited in line with our policy detailed in the 'who we share data with section' on this page. Access is controlled by individual user accounts, where a strong password policy is enforced
- **Dedicated security software:** We operate dedicated security scanning and access control software on all of our websites and servers. This software is responsible for limiting login attempts to our site, blocking potentially malicious

attempts to access our services, and regularly performing full file system scans.

- **Data encryption:** where data is stored in a cloud facility (specifically, the storage of website backup files), that data is encrypted both 'in transit' and 'at rest' – meaning that all data is securely obscured both during the process of transfer to the cloud provider, and then additionally when it is in storage at its final location.
- **Selection of third party service providers:** we use a very limited number of third party service providers, but some are essential for the provision of physical hosting environments and cloud services. One of the core factors in the selection of such providers is their ability to provide secure systems and processes. We have written Data Processing Agreements with each of our core service providers that sets out the requirements for data security.

## **Access to your personal data**

In the situation where you have directly provided personal information to us (such as by completing an online form or contacting us for further information), you have a number of rights regarding the personal data that we hold:

- You have the right to obtain from us confirmation about whether any such data is being held;
- You have the right to require that we provide you with whatever data we are holding/processing about you, including the right for that data to be transferred to another data controller;
- Even if you have consented to us processing your personal data, you have the right to withdraw that permission at any time;
- You have the right to require us to rectify any incomplete or incorrect information held about you;
- You have the right to require us to erase the data held about you (the 'right to be forgotten');

In the situation where we collect personal data automatically (such as from your internet browser or via internet Cookies or other similar technologies):

- You have the right to object to the legal basis upon which we are collecting this

data, and We have an obligation to consider and respond to that objection;

- You have the right to request the prevention of further processing of your data while your objection is considered;
- You have the right to make a complaint to the relevant data protection authority (which, in the UK, is the Information Commissioner's Office or 'ICO')
- In most circumstances, you can exercise these rights without paying a fee to us.

## Types of data collected

### Website contact forms

When you complete one of the contact forms on our website, we will ask you for a number of pieces of personal information, such as your name, email address and other contact details. This is obviously required for us to respond to your request.

If you do not use or submit an online form on the website, no data will be collected in that regard.

#### *Legal Basis:*

**Consent (GDPR Art 6(1)(a)):** Generally, we will ask for your explicit permission to process this data before you are able to submit the contact form. We will also give you a link to our Privacy Policy (this document) that you may review before submitting your details.

**Intent to contract (GDPR Art 6(1)(b)):** Additionally, the information that you provide to us here is necessary for us to fulfil your request prior to entering into a contract.

#### *Types of processing*

- We will **store** the information you provide to us in our website database, and/or in our self-managed Customer Relationship Management system. Such storage allows us to efficiently access your data and respond to your requests;
- For the purpose of maintaining the integrity of our systems, we may also **store** this data in system backups, which are encrypted and held securely by our technology partner.

- We may use this information to **contact you** about other of our own services that we believe may be of genuine interest to you;
- We will NOT use this data for any further purpose without your express further consent;
- We will NEVER sell your information to any 3<sup>rd</sup> party.

*Data minimisation:*

We will only ask you for the minimum amount of information required to appropriately fulfil your request. This will usually be your name, one or more contact details, and any specific information about your request.

*Retention*

If we do not enter into a further contract or agreement with you, we will retain this data for a maximum of 12 months. If you choose to enter into a service agreement with us, we will retain the data for the length of our ongoing agreement plus a maximum of 12 months.

## **Technical data (such as 'IP address')**

When you visit our website, our systems will log a record of your visit in our server logs, and typically this record will include the technical 'IP' address that is associated with your device and the browser type and version that you are using.

Such server logs are extremely common practice, and are used to monitor technical resources, monitor high-level server activity, and importantly to detect and prevent malicious or fraudulent activity on our systems. This data can also be used, if required, to diagnose reports of technical issues. The storage of IP addresses, allow us to identify patterns of behaviour (such as repeated malicious attempts to access a system).

IP addresses, in and of themselves, do not allow us in any way to identify you as an individual, especially given that it is very common for IP addresses to be dynamically allocated by your service provider, and will therefore often routinely change.

Furthermore, we do not and will not use the content of server access logs to attempt to determine an identifiable individual. We therefore do not consider that data held within

server logs falls within the scope of 'personal data', and accordingly we do not seek your consent to collect it.

### *Legal Basis*

In the event that such anonymous data is considered to fall within the scope of the applicable data protection regulations, the legal basis for processing such data is:

**Our Legitimate interest (GDPR Art 6(1)(f)):** The integrity, security and performance of our systems and infrastructure is a vital part of the services that we offer. We consider that it is in our legitimate interest to maintain and protect our systems to this end.

### *Types of processing*

- We will **store** the information you provide to us in our website server logs
- For the purpose of maintaining the integrity of our systems, we may also store this data in infrastructure backups
- We will NOT use this data to attempt to identify an individual person

### *Retention*

Server logs are automatically rotated on our systems, and are retained for a maximum of 12 months following the closure of the relevant log file.

## **Cookies & 'similar technologies'**

We have included cookies, web beacons and similar technologies into one section because they all perform similar functions even if, from a technical perspective, they work slightly differently. All of these technologies allow us to better understand how users are using our website and other related services. They can also be an essential part of providing certain online functionality.

They are all essentially small data files placed on your computer (or other device) that allow us to tell when you have visited a particular page, or performed a particular action (such as clicking a particular button) on our website. These technologies are used by most websites as they provide useful insight into how the services are being used, as well as improving speed, performance and security, and enabling us to improve our personalisation of your experience.

### **Cookies**

These are small text files placed in the memory of your browser or device when you visit a website. Cookies allow a website to recognize a particular device or browser. There are several types of cookies:

- **Session cookies** expire at the end of your browser session and allow us to link your actions during that particular browser session.
- **Persistent cookies** are stored on your device in between browser sessions, allowing us to remember your preferences or actions across multiple sites.
- **First-party cookies** are set by the site you are visiting.
- **Third-party cookies** are set by a third party site separate from the site you are visiting.

There are a number of ways that you can influence how cookies are used on your particular device. Most commercial browsers (such as Chrome, Safari, Edge, Internet Explorer, Firefox etc) allow you to set preferences for whether to allow or block website cookies. They will also provide tools that allow you to remove any cookies that have already been set. Using the 'Help' functionality of your browser, or an internet search, will help you to understand how to use these features for your particular browser.

### **Web beacons**

– Small graphic images (also known as “pixel tags” or “clear GIFs”) that may be included on our sites and services that typically work in conjunction with cookies to identify our users and user behaviour.

### **More detail about our use of cookies**

Our uses of such technologies fall into the following general categories:

- **Operationally Necessary.** We may use cookies, web beacons, or other similar technologies that are necessary to the operation of our sites, services, applications, and tools. This includes technologies that allow you access to our sites, services, applications, and tools; that are required to identify irregular site behaviour, prevent fraudulent activity and improve security; or that allow you to make use of our functions such as shopping-carts, saved search, or similar functions;
- **Performance Related.** We may use cookies, web beacons, or other similar

technologies to assess the performance of our websites, applications, services, and tools, including as part of our analytic practices to help us understand how our visitors use our websites, determine if you have interacted with our messaging, determine whether you have viewed an item or link, or to improve our website content, applications, services, or tools;

- **Functionality Related.** We may use cookies, web beacons, or other similar technologies that allow us to offer you enhanced functionality when accessing or using our sites, services, applications, or tools. This may include identifying you when you sign into our sites or keeping track of your specified preferences, interests, or past items viewed so that we may enhance the presentation of content on our sites;
- **Advertising or Targeting Related.** We may use first-party or third-party cookies and web beacons to deliver content, including ads relevant to your interests, on our sites or on third party sites. This includes using technologies to understand the usefulness to you of the advertisements and content that have been delivered to you, such as whether you have clicked on an advertisement.

The cookies currently in use on this site are as follows:

Cookie	Purpose
_ga, _gat, _gid	Performance Related – Analytics cookies set by Google Analytics

### *Legal Basis*

**Our Legitimate interest (GDPR Art 6(1)(f)):** The integrity, security and performance of our systems and infrastructure is a vital part of the services that we offer. We consider that it is in our legitimate interest to maintain and protect our systems to this end.

For this, and website usability reasons, we do not explicitly seek your consent to place these particular cookies.

### **How do I change my cookie settings?**

You can block most cookies by activating the setting on your browser that allows you to refuse all or some cookies. Please note, blocking all cookies may restrict access to all or parts of our website, or you may experience reduced functionality when accessing

certain services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon you visit our website.

Learn how to turn off cookies for your web browser:

- [Adjust cookie settings in Chrome](#)
- [Adjust cookie settings in Firefox](#)
- [Adjust cookie settings in Internet Explorer](#)
- [Adjust cookie settings in Safari](#)
- [Adjust cookie settings in Microsoft Edge](#)

## **Website Analytics**

We use Google Analytics to better understand what people look at on our website. When people visit our site, information about their visit (such as which pages they look at, how long they spend on the site and so on) is sent in an anonymous form to Google Analytics (which is controlled by Google). The data contains information about anyone who uses our website from your computer, and there is no way to identify individuals from the data. As analytics information is not personal data, we do not specifically ask for your prior consent.

## **Changes to our privacy policy**

This privacy policy may change from time to time in line with legislation or industry developments. We will not explicitly inform our clients or website users of these changes. Instead, we recommend that you check this page occasionally for any policy changes.

## **Your acceptance of these terms**

By using this Site, you signify your acceptance of this policy. If you do not agree to this policy, please do not use our Site. Your continued use of the Site following the posting of changes to this policy will be deemed your acceptance of those changes.

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*Notes: This document is just an example of a Privacy Policy. Please speak with your website designer and/or your hosting provider for more information if you are unsure about any elements within this document.*