

Privacy Policy

This privacy policy (“Privacy Policy”) and any other documents referred to in it, set out the basis on which any information from which you can be identified, such as your name, contact details and ID data (“personal data”) Witty Ditties (“Witty Ditties”, “us”, “we” or “our”) collects from third parties (including its clients and all visitors to the website www.wittyditties.uk (the “website”) (“you“), or that you provide to us, will be processed by us. Witty Ditties is committed to ensuring that your privacy is protected, so please read this Privacy Policy carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting and/or contacting us through the website (or otherwise engaging with us), you acknowledge that we may collect, use and transfer your personal data as set out in this Privacy Policy.

For the purposes of the “Data Protection Legislation” (meaning any law applicable from time to time relating to the processing of personal data and/or privacy as the same may be re-enacted, applied, amended, superseded, repealed or consolidated, including without limitation, the General Data Protection Regulation (EU) 2016/679, and the Privacy and Electronic Communications (EC Directive) Regulations 2003, in each case including any legally binding regulations, directions and orders issued from time to time under or in connection with any such law), the data controller is deemed to be Witty Ditties of Van Dyke Close, London SW15 in respect of any personal data that you provide to us or we otherwise obtain about you.

This Privacy Policy covers:

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1 WHAT TYPE OF PERSONAL DATA DO WE COLLECT FROM YOU?

- 1.1 When you engage with us (e.g. by sending us emails, or by visiting, making an enquiry through or filling in forms on the website), you may provide information about yourself including your name and contact details (e.g. your address, email address and telephone number). Where you make use of our website, we may also collect details of your visits to our Website (e.g. your IP address and choice of web browser, and the resources that you access).
- 1.2 Some of this information is collected and processed so we can perform a contract with you, some for the purpose of legal compliance and some for the purposes of our legitimate business interests (namely to carry out and improve our business, analyse the use of our website and services and support our customers/users).

2. SENSITIVE PERSONAL DATA

- 2.1 “Sensitive personal data” is personal data concerning an individual's (i) racial or ethnic origin, (ii) political opinions, (iii) religious beliefs or other beliefs of a similar nature, (iv) membership of a trade union, (v) physical or mental health or condition, (vi) sexual life or orientation, (vii) commission or alleged commission of any offence or any proceedings for any

offence committed or alleged to have been committed by him/her, the disposal of such proceedings or the sentence of any court in such proceedings.

2.2 You may provide us with sensitive personal data from time to time in connection with our provision of services to you, or otherwise. In such cases, the provision of this information is entirely voluntary and subject to your express consent, however, we may be unable to carry out some activities necessary to process your application, instructions or other requests without the provision of such information. For example, we may be unable to process application forms or similar requests. We will use any sensitive personal data in accordance with the consent you have given and, where necessary, we may also process such information in the establishment, exercise or defence of legal claims.

2.3 Where we do receive sensitive personal data, we will only keep such information for as long as strictly necessary in order to comply with our obligations under the law.

3 HOW DO WE USE YOUR PERSONAL DATA?

3.1 We will only use personal data held about you in the following ways:

3.1.1 to carry out our obligations arising from any contracts entered into between you and us;

3.1.2 to provide you with information, products or services that you request from us and correspond with you;

3.1.3 to provide support to you in respect of our services;

3.1.4 to ensure that content from our website is presented in the most effective manner for you and for your computer;

3.1.5 where relevant, to process your application for employment;

3.1.6 to comply with our own legal and regulatory obligations; and

3.1.7 for our internal business processes.

3.2 We may also use your personal data to provide you with information about goods and services which may be of interest to you and/or inform you about important changes or developments to our services by email where you have explicitly consented at the time we collected your personal data or where we otherwise have a right to do so.

3.3 If you do not want us to use your personal data in this way, please let us know by emailing us your request to unsubscribe at hellowittyditties@gmail.com. You may also opt out of marketing emails by following the instructions outlined in the email.

4 DISCLOSURE OF PERSONAL DATA

4.1 Where it is necessary for the performance of our contract with you or for our internal business processes, we may share your personal data with certain third parties, such as our suppliers, contractors, affiliates, professional advisers, regulatory bodies, auditors, technology providers, and/or third-party partners and any duly authorised agents or related, associated or affiliated companies of the foregoing.

4.2 By submitting your personal data to us, you acknowledge that such third parties may receive and process your personal data. We ask all third parties to treat your personal data securely and in accordance with this Privacy Policy and will take reasonable steps to enforce this. We will never sell your personal data.

4.3 In addition, it may be necessary to disclose your personal data if:

4.3.1 we are under a duty to disclose or share your personal data in order to comply with any legal obligation, carry out an internal investigation, or in order to enforce or apply our terms of use and other agreements, or to protect the rights, property or safety of Witty Ditties, our group companies, customers or others, including exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;

4.3.2 Witty Ditties or substantially all of its assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.

5 HOW WE PROTECT YOUR PERSONAL DATA

5.1 The personal data you provide to us will be transferred to and stored securely on our servers in the UK or our Cloud hosted in the EEA. and we take all reasonable care to ensure

the security of the Website and of your personal data from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage.

5.2 We will only keep your personal data for as long as we reasonably require and, in any event, only for as long as the Data Protection Legislation allows.

5.3 Unfortunately, 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 website. Any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

6 YOUR RIGHT TO ACCESS AND UPDATE YOUR PERSONAL DATA

6.1 You have the right to ask us not to process your personal data for marketing or research purposes. If you have given us your express consent, or where we otherwise have the right to do so, we may use your personal data for marketing purposes. If we intend to disclose your personal data to any third party for marketing purposes, we will seek your explicit consent prior to any such transfer. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your personal data, or by contacting us at hellowittyditties@gmail.com.

6.2 You are entitled to know some details about the personal data hold about you and how that information is processed. If you would like to request this, please email us providing us with sufficient information to identify you (we may need to request proof of identity in some instances), and we will provide you with the information to which you are entitled.

6.3 You have the right to ask us to: (a) make any changes to ensure that any personal data we hold about you is accurate and up to date; (b) erase or stop processing any personal data we hold about you where there is no longer a legal ground for us to hold it; or (c) in some circumstances, transfer any information we hold about you to a specified third party. If you wish to do this, please contact us at hellowittyditties@gmail.com.

7 COMPLAINTS

7.1 Should you have any queries or complaints in relation to how we use your personal data, please contact us at hellowittyditties@gmail.com. Should you wish to take any complaints or queries further, you have the right to contact the Information Commissioner's Office regarding such issues.

8 COOKIES

8.1 A cookie is a small file that is sent to your browser from a web server and is stored on your computer. Cookies help us to analyse web traffic and identify which pages of our website are being used. Our website also uses cookies to respond to you as an individual so that it can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences as well as enabling you to login. We only use this information for statistical analysis purposes and then it is removed from our systems.

8.2 A cookie in no way gives us access to your computer or any information about you, other than information about how you use the Website and the personal data you choose to share with us (including personal data you automatically share with us by way of your browser settings).

8.3 In particular, we use the following cookies:

8.3.1 Functionality cookies. These cookies are used to identify unique visitors to Websites. If you log in to the Websites, these are the cookies that allow us to remember who you are and what your preferences are so that we can provide you with access to pages personal to you, for example your account pages or your selected font size. These cookies can help to keep your visit to the site secure.

8.3.2 Session cookies. These cookies allow us to identify your device as you use the Website, so that you are not treated as a new visitor each time you go to another part of the Website.

8.4 You can choose to accept or decline cookies. Most web browsers automatically accept certain cookies, but you can usually modify your browser setting to decline cookies if you

prefer. This may prevent you from taking full advantage of our website. We may also use banners and pop-ups from time to time to give you options around cookie use.

8.5 You can find more information about the specific cookies we use and the purposes for which we use them in the table attached to this Privacy Policy. You can also find more information about cookies generally here: www.allaboutcookies.org.

9 LINKS TO OTHER WEBSITES

9.1 This Privacy Policy extends only to our website and does not cover your use of, provision of data to and collection of data on any other website.

9.2 Our Website may from time to time contain links to and from other websites. 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 websites or their related policies. You should always check these policies before you submit any personal data to these websites.

10 CHANGES TO THIS PRIVACY POLICY

10.1 Our Privacy Policy may be reviewed and enhanced from time to time. The up-to-date version of our Privacy Policy is always available by on our website or by emailing hellowittyditties@gmail.com. If you are not happy with any changes that we make, you should not use or access (or continue to use or access) the Website and/or our services.

11 CONTACT

11.1 Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to hellowittyditties@gmail.com. If you no longer wish to receive materials from us and/or from such third parties, you may opt-out of receiving these communications by emailing us your request to unsubscribe at hellowittyditties@gmail.com.