



## **PRIVACY POLICY**

### **Your rights as a data subject**

Because I am an Isle of Man resident, I am subject to Isle of Man (IOM) laws. The IOM's Data Protection Act 2002 was amended in 2018 to incorporate the GDPR. In practice, the Manx Legislation is similar to that of the UK. Under the Data Protection Acts in the UK and the Isle of Man, including the GDPR regulations, you have rights as an individual which you can exercise in relation to the information I hold about you. At any point while I am in possession of, or processing, your personal information you have the following rights:

1. You have the right to request a copy of the information that I hold about you;
2. You have the right to correct data that I hold about you that is inaccurate or incomplete;
3. In certain circumstances you can ask for the data I hold about you to be erased from my records;
4. Where certain conditions apply, you have the right to restrict the processing of your data;
5. You have the right to have the data I hold about you transferred to another organisation;
6. You have the right to object to certain types of processing such as direct marketing;
7. You have the right to be subject to the legal effects of automated processing including profiling.

Under current legislation, I am required to:

- only collect data for a specific purpose;
- keep it secure and up to date;
- only hold what is needed for as long as it is needed; and
- permit the data subject access to their information on request.

### **The data I collect and why**

I collect data through contact by email, over the phone, hardcopy mail, or through my website. For the most part, it is not 'sensitive' data. I only collect data relevant to my business arrangements with you. This might be an enquiry about my services, or it might be contractual details about an arrangement we make for me to provide a service to you. This is likely to be restricted to basic, non-sensitive data, unless you choose to provide extra information, either by way of the content of your copy, or if you feel that the additional information is relevant to your enquiry/contract. I do not collect data relevant to items 6 and 7 in your rights listed above. I may send you (with your permission) details of special offers or seasonal greetings.

I also monitor any emails and file attachments for viruses or malicious software. Currently I use Norton software to do this but it is resident on my computer and does not involve uploading any of your data to Norton. Please be aware that you have a

responsibility to ensure that any email or document you send to me is within the bounds of the law and is, to the best of your knowledge, virus free.

## **How I store your data and who can access it**

All personal information is kept with the highest standards and safeguards in place. This includes technical security, preventing unauthorised access, undertaking audits and maintaining backups. Data which comes to me through my website or by email will be held in the cloud. The website uses a hosting service and email is processed by Gmail. Data which comes to me as part of an enquiry or contract in respect of my services, including copy, will be held on my private computer, or in my private Dropbox/MS OneDrive accounts. No-one else has access to any of these methods or accounts, which are password protected. Data I hold on paper, including copy sent for editing, is kept in a filing cabinet or my desk, which are both located in my office. No-one else has access to either of these.

## **Social media**

You may also choose to provide me with personal information on or through my social media platforms. Please check the platform's privacy policy and terms of service prior to sending anything, especially if it is in some way sensitive. Social media message boxes are accessed by myself only. When visitors leave comments on my website or social media public pages, their comment will be visible to the public.

## **With whom do I share your data?**

None of your data will be shared with anyone else or any other organisation, unless you give permission in writing. This includes your copy and any contractual and associated documents. There are a small number of exceptions required by law, but it is unlikely in the extreme that our contact will fall into any of the exception categories. Currently these primarily relate to a criminal act by you which is being investigated by the police; a situation which would affect national security; or situations which might expose you to actual harm, for example if you told me you were going to commit suicide.

## **For how long do I retain your data?**

If you leave a comment on social media or my website, the comment and its metadata are retained indefinitely, or according to the social media site's policies. Data I hold in respect of a contract for services or for answering enquiries will be held for the duration of our contract plus seven years, to meet financial requirements.

## **Data breaches**

Because I would not share any of your information without your written permission, a data breach is unlikely. However, any perceived data breaches will be fully investigated by me and a report made back to you. If you are unhappy with my response, you may raise the matter with the Isle of Man Information Commissioner, with whom I am registered. The Commissioner's contact details are:

Isle of Man Information Commissioner, PO Box 69, Douglas, Isle of Man, IM99 1EQ  
Tel: +44 (0) 1624 693260, Email: [ask@inforights.im](mailto:ask@inforights.im) Website: [www.inforights.im](http://www.inforights.im)