

## Marketing Privacy Policy

By using our website you consent to the collection, use and transfer of the information that you provide to us in accordance with the terms of this policy.

We reserve the right to change this policy from time to time at our sole discretion. It is your responsibility to familiarise yourself with this policy regularly to ensure that you are aware of any changes. Your use of this website after a change has been posted will signify your acceptance of the modified privacy policy.

### Definitions

- Consent:** Agreement which must be freely given, specific, informed and be an unambiguous indication of the Data Subject's wishes by which they, by a statement or by a clear positive action, signifies agreement to the Processing of Personal Data relating to them.
- Data Controller:** The person or organisation that determines when, why and how to process Personal Data. It is responsible for establishing practices and policies in line with the GDPR. We are the Data Controller of all Personal Data relating to our Company Personnel and Personal Data used in our business for our own commercial purposes.
- Data Subject:** A living, identified or identifiable individual about whom we hold Personal Data. Data Subjects may be nationals or residents of any country and may have legal rights regarding their Personal Data.
- Personal Data:** Any information identifying a Data Subject or information relating to a Data Subject that we can identify (*directly or indirectly*) from that data alone or in combination with other identifiers we possess or can reasonably access. Data can be factual (for example, a name, email address, location or date of birth) or an opinion about that person's actions or behaviour.
- Personal Data Breach:** Any act or omission that compromises the security, confidentiality, integrity or availability of Personal Data or the physical, technical, administrative or organisational safeguards that we or our third-party service providers put in place to protect it. The loss, or unauthorised access, disclosure or acquisition, of Personal Data is a Personal Data Breach.
- Processing/Process:** Any activity that involves the use of Personal Data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring Personal Data to third parties.

### Data collection and Retention

Johnsons understands that, under the GDPR, data controllers should not retain personal data for any longer than necessary.

On collection of data, Johnsons will obtain 'opt in' permission before retaining personal data. Furthermore, the GDPR gives data subjects rights to require the erasure of their personal data (*also known as "the right to be forgotten"*).

We will retain the personal data provided by you for as long as is reasonably necessary for the purposes listed in this policy.

## Consent

A Data Controller must only process Personal Data on the basis of one or more of the lawful bases set out in the GDPR, which include Consent.

A Data Subject consents to Processing of their Personal Data if they indicate agreement clearly either by a statement or positive action to the Processing. Consent requires affirmative action so silence, pre-ticked boxes or inactivity are unlikely to be sufficient. If Consent is given in a document which deals with other matters, then the Consent must be kept separate from those other matters.

Data Subjects must be easily able to withdraw Consent to Processing at any time and withdrawal must be promptly honoured. Consent may need to be refreshed if you intend to Process Personal Data for a different and incompatible purpose which was not disclosed when the Data Subject first consented.

## Protecting Personal Data

Personal Data must be secured by appropriate technical and organisational measures against unauthorised or unlawful Processing, and against accidental loss, destruction or damage.

We will develop, implement and maintain safeguards appropriate to our size, scope and business, our available resources, the amount of Personal Data that we own or maintain on behalf of others and identified risks (*including use of encryption and Pseudonymisation where applicable*). We will regularly evaluate and test the effectiveness of those safeguards to ensure security of our Processing of Personal Data.

We will maintain data security by protecting the confidentiality, integrity and availability of the Personal Data, defined as follows:

- (a) Confidentiality means that only people who have a need to know and are authorised to use the Personal Data can access it.
- (b) Integrity means that Personal Data is accurate and suitable for the purpose for which it is processed.
- (c) Availability means that authorised users are able to access the Personal Data when they need it for authorised purposes.

We will comply with and not attempt to circumvent the administrative, physical and technical safeguards we implement and maintain in accordance with the GDPR and relevant standards to protect Personal Data.

## Data Subjects

Data Subjects have rights when it comes to how we handle their Personal Data. These include rights to:

- (a) withdraw Consent to Processing at any time;
- (b) receive certain information about the Data Controller's Processing activities;
- (c) request access to their Personal Data that we hold;
- (d) prevent our use of their Personal Data for direct marketing purposes;
- (e) ask us to erase Personal Data if it is no longer necessary in relation to the purposes for which it was collected or Processed or to rectify inaccurate data or to complete incomplete data;
- (f) restrict Processing in specific circumstances;
- (g) challenge Processing which has been justified on the basis of our legitimate interests or in the public interest;
- (h) request a copy of an agreement under which Personal Data is transferred outside of the EEA;
- (i) prevent Processing that is likely to cause damage or distress to the Data Subject or anyone else;

- (j) be notified of a Personal Data Breach which is likely to result in high risk to their rights and freedoms;
- (k) make a complaint to the supervisory authority; and
- (l) in limited circumstances, receive or ask for their Personal Data to be transferred to a third party in a structured, commonly used and machine-readable format.

We will verify the identity of an individual requesting data under any of the rights listed above.

## Reporting a Personal Data Breach

The GDPR requires Data Controllers to notify any Personal Data Breach to the applicable regulator (ICO) and, in certain instances, the Data Subject.

We have put in place procedures to deal with any suspected Personal Data Breach and will notify Data Subjects or any applicable regulator where we are legally required to do so.

## Direct Marketing

Johnsons are subject to certain rules and privacy laws when marketing to our customers. We may use the information we collect from you when you register, make a purchase, sign up for our newsletter, respond to a survey or marketing communication, surf the website, or use certain other site features in the following ways:

- To quickly process your transactions
- To send periodic emails regarding your order or other products and services

A Data Subject's prior consent is required for electronic direct marketing (for example, by email, text or automated calls). The limited exception for existing customers known as "soft opt in" allows organisations to send marketing texts or emails if they have obtained contact details in the course of a sale to that person, they are marketing similar products or services, and they gave the person an opportunity to opt out of marketing when first collecting the details and in every subsequent message. The right to object to direct marketing must be explicitly offered to the Data Subject in an intelligible manner so that it is clearly distinguishable from other information.

A Data Subject's objection to direct marketing must be promptly honoured. If a customer opts out at any time, their details should be suppressed as soon as possible. Suppression involves retaining just enough information to ensure that marketing preferences are respected in the future.

If at any time users want Johnsons to stop sending such communications, they should email via our website or write to:

### The Data Protection Officer

Johnsons 1871  
7 Brunel Court  
Gadbrook Park  
Northwich  
Cheshire  
CW9 7LP

Amendment of personal data takes place within 2 working days of receipt of the request if made online and 10 working days if made offline.

## IP Addresses and Cookies

This website utilises a standard technology called 'cookies' and web server log files to collect information about how this website is used. A 'cookie' is a small piece of information sent from our

website to your computer to help us to identify you quickly. The information we collect allows us to monitor website traffic and to personalise content of the website for you. The information we collect is anonymous.

You do not need to accept cookies and may alter the configuration of your browser to refuse cookies. If you choose to have your browser refuse cookies it is possible that some areas of this website will not function as effectively when viewed.

**Other Websites:** Our website may contain links to other third-party sites that are not governed by this privacy policy. Although we endeavour to only link to sites with high privacy standards, our privacy policy will no longer apply once you leave our website. Additionally, we are not responsible for the privacy practices employed by third party websites. Therefore, we suggest that you examine the privacy statements of those sites to learn how your information may be collected, used, shared and disclosed.

This website uses the Google AdWords remarketing service to advertise on third party websites (*including Google*) to previous visitors to our site. It could mean that we advertise to previous visitors who haven't completed a task on our site, for example using the contact form to make an enquiry. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. Third-party vendors, including Google, use cookies to serve ads based on someone's past visits to the Johnsons Moving Services Ltd website. Of course, any data collected will be used in accordance with our own privacy policy and Google's privacy policy.

You can set preferences for how Google advertises to you using the Google Ad Preferences page, and if you want to you can opt out of interest-based advertising entirely by cookie settings or permanently using a browser plugin.

## **Security**

We employ security measures to protect the information provided by you from access by unauthorised persons and against unlawful processing, accidental loss, destruction or damage.

## **Your Rights**

You may ask us to make changes to the information provided by you and/or held about you, to ensure that it is accurate and kept up to date. You may also request that we cease from processing your personal information and that we delete your data from our database or records.

We will only perform the activities outlined above to the extent that such activities will not compromise privacy, security or any other legal interests.

## **Sharing Personal Data**

Generally, we are not allowed to share Personal Data with third parties unless certain safeguards and contractual arrangements have been put in place.

We will only share the Personal Data we hold with third parties, such as our service providers if:

- (a) they have a need to know the information for the purposes of providing the contracted services;
- (b) sharing the Personal Data, if required, the Data Subject's Consent has been obtained;
- (c) the third party has agreed to comply with the required data security standards, policies and procedures and put adequate security measures in place.

## Johnsons Third Party Providers:

### • Zoho - manage social media interactions

If you send us a private or direct message via social media the message will be stored by Hootsuite for three months. It will not be shared with any other organisations.

### • Zoho – E-Newsletter

We use a third-party provider, MailChimp, to deliver our monthly e-newsletters. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter.

### • Wordpress – Website & Blog

We use a third-party service, WordPress.com, to publish our blog, and our website. These are hosted at WordPress.com, which is run by Automattic Inc. We use a standard WordPress service to collect anonymous information about users' activity on the site, for example the number of users viewing pages on the site, to monitor and report on the effectiveness of the site and help us improve it.

### • Marketing Management – Embrace Marketing

We use Embrace Marketing to support our marketing strategy, website build and social media. No specific data is collected or stored by Embrace Marketing.

### • Website Management – Electric Circus

We use a third-party provider, Electric Circus, to support our strategy, progression and the management of our website. No specific data is collected or stored by Electric Circus. View their privacy policy [here](#).

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

## Changes to this Privacy Policy

We reserve the right to change this Privacy Policy at any time without notice to you so please check back regularly to obtain the latest copy of this Privacy Standard.

This Privacy Standard does not override any applicable national data privacy laws and regulations in countries where the Company operates.



Gareth Hilton  
Managing Director  
02<sup>nd</sup> October 2019