

GDPR transparency notice

Joie de Booth Ltd (we), company number: and registered office at Joie de Booth the address is 32 Seaview Road, Brighton, East Sussex BN2 6DF.

1. What is the purpose of this document?

- . 1.1. This transparency notice describes how we collect and use your personal information. We are a "data controller". This means that we are responsible for deciding how we hold and use personal information about you and explaining it clearly to you.
- . 1.2. It is important that you read this notice, together with any other transparency notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.
- . 1.3. We reserve the right to update this transparency notice at any time, and we will provide you with a new transparency notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

2. How do we collect information about you?

- . 2.1. We collect personal information direct from you when you request to book the use of our services.

What information do we hold?

- . 2.2. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). There are special categories of more sensitive personal data which require a higher level of protection.

- 2.5. We will collect, store and use the following categories of personal information about you:

<p>we collect the following: (Workers' Information):</p>	
<ul style="list-style-type: none"> • Bank account details. 	

- 2.8. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

3. How we will use information about you

3.1. We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- 3.1.1. Where we need to comply with a legal obligation.
- 3.1.2. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests, which includes using website profiles and photographs for our marketing purposes.
- 3.2. We may also use your personal information in the following situations, which are likely to be rare:
 - 3.2.1. Where we need to protect your interests (or someone else's interests).
 - 3.2.2. In exceptional circumstances with your consent.
- 3.3. Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information. Where we rely on legitimate interests, we have our legitimate interests are:

- . 3.3.1. To ensure the smooth running of our business.
- . 3.3.2. Managing our contractual relationship with you as our clients .
- . 3.4. We use your personal information as follows:
 - . 3.4.1. We use the Data for: business management and planning, including ac- counting and auditing;.
- . 3.5. We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- . 3.6. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4. How we use particularly sensitive personal information

4.1. Special categories of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- . 4.1.1. In limited circumstances, with your explicit written consent.
- . 4.1.2. Where we need to carry out our legal obligations and in line with our data protection policy.
- . 4.2. Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are

not capable of giving your consent, or where you have already made the information public.

5. Data sharing

- . 5.1. We may have to share your data with third parties, including any other entities in our group, third-party service providers who provide services to us and other third parties who use your information, as data controller, for their own purposes.
- . 5.2. We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

6. Transferring information outside the EU

6.1. All our personal information is hosted on servers located within the EEA. We do not transfer information outside the EEA during the normal course of our business.

7. Data security

- . 7.1. We have put in place measures to protect the security of your information. Details of these measures are available upon request.
- . 7.2. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.
- . 7.3. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.
- . 7.4. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

8. How long will we will use your information for?

- . 8.1. We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- . 8.2. To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.
- . 8.3. In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.
- . 8.4. Where a minimum retention period is required by law (such as retaining records for HMRC purposes) we comply with that minimum period plus up to [3] months to allow time for us to anonymise or delete information in accordance with our internal data management processes.

9. Your rights in connection with personal information

9.1. Under certain circumstances, by law you have the right to:

9.1.1. **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

9.1.2. **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

9.1.3. **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good

reason for us continuing to process it. You also have the right to ask us to delete or re- move your personal information where you have exercised your right to object to processing (see below).

9.1.4.Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

9.1.5.Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

9.1.6.Request the transfer of your personal information to another party.

9.1.7.Withdraw consent in the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we are required to continue to process your information in accordance with another lawful basis which has been notified to you.

- . **9.2.** To exercise any of the above rights, please contact us by email or telephone.

- . **9.3.** You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

- . **9.4.** We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal

information is not disclosed to any person who has no right to receive it.