

# Privacy Policy for Starred Photos – Photo Manager

Starred Photos is a photo organising and digital decluttering service.

As a visitor to our website, we want you to know that Starred Photos places a high value on your data, and we are committed to keeping it safe.

Starred Photos is committed to protecting the privacy and security of your personal information. We take care to protect the privacy of our customers that communicate (online or offline) with us, over the phone, through our website and social media platforms. In this Privacy Policy we'll cover the types of data we may collect from you, where we collect it, how we store it, how we use it, and how we keep it safe.

We have therefore developed this privacy notice to inform you of the data we collect, what we do with your information, what we do to keep it secure as well as the rights and choices you have over your personal information.

This website is not intended for children and we do not knowingly collect data relating to children.

Throughout this document we refer to Data Protection Legislation which means the Data Protection Act 2018 which incorporates the General Data Protection Regulation (GDPR), the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any legislation implemented in connection with the General Data Protection Regulation which is the governing legislation that regulates data protection across the EEA. This includes any replacement legislation coming into effect from time to time.

We have appointed a Data Protection Lead (DPL) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact them by using the details set out below.

DPL: Mrs Elizabeth Marshlain

Full name of legal entity: Starred Photos – Photo Manager

Email address: [data@myphotomanager.co.uk](mailto:data@myphotomanager.co.uk)

Postal address: Starred Photos, Valley Cottage, Ipswich, IP9 2JE

Telephone number: 07974 394 766

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **The information we collect and when**

We only collect information that we know we will genuinely use and in accordance with the Data Protection Legislation. The type of information that we will collect on you, and you voluntarily provide to us on this website, over the phone, via forms, service delivery or face to face includes:

- Your personal details: such as your name and/or address etc.
- Details of contact we have had with you in relation to the provision, or the proposed provision, of our services
- Communication Data including telephone, email, text, social media messaging, social media posting, and any other communication methods you may use to contact us

- Details of any services you have received from us
- Appointment information, including address and contact details
- Relevant documents and signatures needed to enter into a working agreement e.g., agreed terms and conditions
- Our correspondence and communications with you
- Invoicing and accounting information
- Information about any complaints and enquiries you make to us Information from research, surveys, and marketing activities
- Information we receive from other sources, such as publicly available information, information provided by your employer or our clients or information from our member network firms.
- Client testimonials and feedback
- Sensitive data such as information about individuals in your family and where they live etc.

[We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.]

### **Cookies**

This website uses cookies and similar technologies, which are small files or pieces of text that download to a device when a visitor accesses a website or app.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. Except for essential cookies, all cookies will expire after 14 days.

For more information about the cookies we use, please see our cookie notice below

### **Use of Cookies**

This website uses cookies to better the users experience while visiting the website.

Where applicable this website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer / device. This complies with recent legislation requirements for websites to obtain explicit consent from users before leaving behind or reading files such as cookies on a user's computer / device.

Cookies are small files saved to the user's computer's hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within this website.

Users are advised that if they wish to deny the use and saving of cookies from this website on to their computers hard drive they should take necessary steps within their web browsers security settings to block all cookies from this website and its external serving vendors.

This website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer's hard drive in order

to track and monitor your engagement and usage of the website, but will not store, save or collect personal information. You can read Google's privacy policy here for further information <http://www.google.com/privacy.html>.

Other cookies may be stored to your computer's hard drive by external vendors when this website uses referral programs, sponsored links or adverts. Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal information is stored, saved or collected.

### **Change of Purpose**

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Data Sharing**

Why might you share my personal data with third parties?

We will share your personal data with third parties where we are required by law, where it is necessary to administer the relationship between us or where we have another legitimate interest in doing so.

Which third-party service providers process my personal data?

"Third parties" includes third-party service providers and other entities within our group or the members of our firm's network. The following activities are carried out by third-party service providers: IT and cloud services, professional advisory services, administration services, marketing services and banking services. All of our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties? We may share your personal data with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal data with a regulator or to otherwise comply with the law.

### **How we collect and use your information**

Direct collection

We may collect data about yourself that you provide directly to us through such communication methods as email, telephone, website contact page etc.

Google Analytics

Google Analytics is used by [www.starredphotos.co.uk](http://www.starredphotos.co.uk) to measure website usage. All collected data is anonymised and individual users cannot be identified. For more information see [Google's Privacy Policy](#)

We do not sell email lists to other businesses or organisations.

Website Contact Form

We will collect data from you via the contact form on the 'Get in Touch' page on our website. We collect your name, email, phone number (if you provide it in the message field) and any other information you write to us in the message field related

to your query. This message is used to bespoke our services to your requirements and continue communication to agree on the work timings, fees etc.

### **Data usage**

We will only use your personal data for the purpose necessary for the performance of our contract with you. We may process your personal data for certain additional purposes with your consent, and in these limited circumstances where your consent is required for the processing of your personal data then you have the right to withdraw your consent to processing for such specific purposes. Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

We may use your personal data in order to:

- Carry out our obligations arising from any agreements entered into between you or your employer
- Provide you with information related to our services and our events and activities that you request from us or which we feel may interest you, provided you have consented to be contacted for such purposes
- Seek your thoughts and opinions on the services we provide
- Notify you about any changes to our services

In some circumstances we may anonymise or pseudonymise the personal data so that it can no longer be associated with you, in which case we may use it without further notice to you. We may also process your personal data without your knowledge or consent, in accordance with this notice, where we are legally required or permitted to do so.

If we need to use your data for an unrelated new purpose, we will let you know and explain the legal grounds for its use.

### **Retention of data**

We will only keep your personal data 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. When deciding what the correct time is to keep the data for, we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

### **Tax requirements**

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers. This information will remain on our invoicing system for as long as required for accounting purposes.

### **Enquiry information**

For enquiries by email, phone or via the website we may keep your Contact details for up to 2 years from our last point of contact to follow up on your progress and potential future service requirements. You can ask to be removed from our prospect engagement list by emailing us at [data@starredphotos.uk](mailto:data@starredphotos.uk) at any time.

### **Marketing communication**

Where you've given explicit consent to receive direct marketing, newsletters or emails, your details will remain on the system for as long as you wish to receive these emails from us. Should you decide you no longer wish to receive such emails from us, you can unsubscribe at any time by following the opt-out / unsubscribe on any marketing messages we send to you. Once you opt-out / unsubscribe, your details

will be removed from our system. You can request to be removed by emailing us at [data@myphotomanager.co.uk](mailto:data@myphotomanager.co.uk)

## **Your rights over your information**

### **Right to Access Your Personal Information**

You have the right to access the personal information that we hold about you in many circumstances, by making a request. This is sometimes termed 'Subject Access Request'. If we agree that we are obliged to provide personal information to you (or someone else on your behalf), we will provide it to you or them free of charge and aim to do so within 30 days from when your identity has been confirmed.

We would ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information.

If you would like to exercise this right, please contact us as set out below.

### **Right to Correction Your Personal Information**

If any of the personal information we hold about you is inaccurate or out of date, you may ask us to correct it.

If you would like to exercise this right, please contact us as set out below.

### **Right to Object, Erasure or Limit Our Processing of Your Data**

You have the right to object to us processing your personal information if we are not entitled to use it anymore, to have your information deleted if we are keeping it too long or have its processing restricted in certain circumstances.

If you would like to exercise this right, please contact us as set out below.

### **For more information about your privacy rights**

The Information Commissioner's Office (ICO) regulates data protection and privacy matters in the UK. They make a lot of information accessible to consumers on their website and they ensure that the registered details of all data controllers such as ourselves are available publicly. You can access them here <https://ico.org.uk/for-the-public>.

### **How long we keep your information for**

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

Unless otherwise required by law, your data will be stored for a period of 2 years after our last contact with you/some other identifiable action or period, at which point it will be deleted. Details of retention periods for different aspects of your personal data are available upon request by contacting us as outlined below.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

### **3rd party links and sharing your thoughts**

When using our website, you may be able to share information through social networks like Facebook and Twitter. For example, when you 'like', 'share' or review our Services. When doing this, your personal information may be visible to the providers of those social networks and/or their other users. Please remember it is your responsibility to set appropriate privacy settings on your social network accounts, so you are comfortable with how your information is used and shared on them.

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### **Remarketing**

We also use Facebook Tools and Clickfunnels as part of our service. You will only be retargeted if you previously accepted the terms of the platform and consented to remarketing. Facebook remarketing service is provided by Facebook Inc that include the use of cookies, web beacons and other storage technologies. You can learn more about interest-based advertising from Facebook by visiting this page. To opt-out from Facebook's interest-based ads follow these instructions from Facebook.

reCAPTCHA Is a product from Google that helps protect websites from spam and abuse. A "CAPTCHA" is a test to tell human and bots apart. It is easy for humans to solve, but hard for "bots" and other malicious software to figure out. By adding reCAPTCHA to our site, we can block automated software while helping us welcome real users like you. First, the reCAPTCHA algorithm will check to see if there's a Google cookie placed on the computer being used. Then, an additional reCAPTCHA-specific cookie will be added to your browser, and a complete snapshot of the browser window at that moment in time will be captured, pixel by pixel. More information can be found at Google reCAPTCHA and Google's Privacy Policy. Alternatively, you can contact us by email.

We use Mailchimp as our marketing platform. By clicking below to subscribe, you acknowledge that your information will be transferred to Mailchimp for processing. [Learn more about Mailchimp's privacy practices here.](#)

### **Data Security**

We keep your data security by:

- All documents and data we store are saved on password-protected devices.
- We practice common-sense cyber-security requirements, such as locking screens when away from them, as well ensuring appropriate Windows and Mac OS updates are installed on release.
- Where possible we use two-factor authentication on our key systems.
- We use a heavily encrypted password facility and regularly update passwords on our system
- We use up-to-date virus software and regularly scan all external hard drives

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.

### **External Links**

This website may contain links to other sites. Starred Photos is not responsible for other websites' privacy practices. This privacy notice applies solely to the information collected by this website.

### **Your consent**

By using this website (<https://myphotomanager.co.uk>), any related sites or social media pages, or getting in touch by email or phone, you are consenting to the Starred Photos Privacy Policy.

### **How to contact us**

If you would like to exercise one of your rights as set out above, or you have a question or a complaint about this notice, the way your personal information is processed, please contact us by one of the following means:

*By email:* [hello@myphotomanager.co.uk](mailto:hello@myphotomanager.co.uk)

*By post:* Starred Photos, Valley Cottage, Ipswich, IP9 2JE

Thank you for taking the time to read our Privacy Notice.

Starred Photos

This Privacy Notice was last updated on 7th March 2024.