

## Website privacy policy (version 2.0)<sup>1</sup>

We are committed to safeguarding the privacy of our website visitors; this policy<sup>2</sup> sets out how we will treat your personal information.<sup>3</sup>

### (1) What information do we collect?

We may collect, store and use the following kinds of personal data:

- [(a) information about your computer and about your visits to and use of this website, such as your IP address, geographical location, browser type, referral source, length of visit and number of page views;
- [(b) information relating to any transactions carried out between you and us on or in relation to this website, including information relating to any purchases you make of our goods or services
- [(c) information that you provide to us for the purpose of registering with us
- [(d) information that you provide to us for the purpose of subscribing to our website services, email notifications and/or newsletters

---

1 The purpose of a website privacy policy is help webmasters and web-based businesses comply with data protection legislation. In the UK, that primarily means compliance with the Data Protection Act 1998 and the Privacy and Electronic Communications (EC Directive) Regulations 2003. Failure to comply with data protection legislation can lead to civil liability and criminal law penalties. Our template privacy policy is designed for use by businesses based in the UK (although the UK data protection regime derives from EU law, there are differences in how that EU law has been implemented in the different member states of the EU). The template is designed for websites which collect standard kinds of non-sensitive personal data for standard kinds of use. It should not be used for websites which collect sensitive personal data (such as information relating to a person's health, sexuality, ethnicity or politics). It may be suitable, for example, for use with websites which act as online company brochures or online shops. The website privacy policy template will need to be edited before it is ready for use. Square brackets in the document indicate the sections which need or are likely to need to be edited. However, you should of course carefully review the whole document to ensure that it meets with your requirements. Please note that the use of a privacy policy does not exhaust your data protection obligations. If you are in any doubt regarding the preparation of your privacy policy or your data protection obligations generally, you should seek professional advice.

2 The privacy policy should be clearly and easily accessible to website visitors from the website home page and any page which collects personal data (e.g. "The personal information we collect on this page will be treated in accordance with our [privacy policy](#)"). In addition, key information about the use of personal data should be provided on the page where the data is collected, rather than in a separate document.

3 "Personal information": for day-to-day purposes, it is best to assume that all information which relates to a living individual constitutes personal information. We use "personal data" and "personal information" interchangeably in this template.

[(e) any other information that you choose to send to us;

## **(2) Cookies**

We may at some point use cookies on this website. A cookie is a text file sent by a web server to a web browser, and stored by the browser. The text file is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We may send a cookie which may be stored on by your browser on your computer's hard drive. We may use the information we obtain from the cookie in the administration of this website, to improve the website's usability and for marketing purposes. We may also use that information to recognise your computer when you visit our website, and to personalise our website for you.

Most browsers allow you to refuse to accept cookies. For example, in Internet Explorer you can refuse all cookies by clicking "Tools", "Internet Options", "Privacy", and selecting "Block all cookies" using the sliding selector. This will, however, have a negative impact upon the usability of many websites, including this one.<sup>4</sup>

We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at: <http://www.google.com/privacypolicy.html>.<sup>5</sup>

## **(3) Using your personal data**

Personal data submitted on this website will be used for the purposes specified in this privacy policy or in relevant parts of the website.

We may use your personal information to:

- (a) administer the website;
- (b) improve your browsing experience by personalising the website;
- (c) enable your use of the services available on the website;
- (d) send to you goods purchased via the website, and supply to you services purchased via the website;

---

4 If your site doesn't use cookies, the paragraphs on cookies can be deleted.

5 If you don't use Google Analytics, you should check whether your analytics system uses cookies and include an appropriate explanatory paragraph if it does.

- (e) send statements and invoices to you, and collect payments from you;
- (f) send you general (non-marketing) commercial communications;
- (g) send you email notifications which you have specifically requested;
- (h) send to you our newsletter and other marketing communications (relating to our business which we think may be of interest to you by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications to be sent by emailing us at [mick@spirit-medium.org](mailto:mick@spirit-medium.org)<sup>6</sup>;
- (i) provide third parties with statistical information about our users – but this information will not be used to identify any individual user;
- (j) deal with enquiries and complaints made by or about you relating to the website;

We will not without your express consent provide your personal information to any third parties for the purpose of direct marketing.<sup>7</sup>

#### **(4) Other disclosures**

In addition to the disclosures reasonably necessary for the purposes identified elsewhere in this privacy policy, we may disclose information about you:

- (a) to the extent that we are required to do so by law;
- (b) in connection with any legal proceedings or prospective legal proceedings;
- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); and
- (d) to the purchaser (or prospective purchaser) of any business or asset which we are (or are contemplating) selling.<sup>8</sup>

---

<sup>6</sup> As a general rule, where you plan to use personal information you have collected for the purpose of direct marketing, this should be made clear on the page where the information is collected, and you should ensure that this only happens if users opt-in to the marketing (e.g. “Click here if you would like us to send you information by email about products which we think will interest you...”). There are however exceptions to this general rule. There are also rules about the content of direct marketing communications. If you are in any doubt about complying with your legal obligations in relation to direct marketing, you should seek professional advice.

<sup>7</sup> It is good practice to also say what you will *not* do with personal information (within reason).

<sup>8</sup> If there is any chance of you ever wanting to sell your business, you should include this provision.

Except as provided in this privacy policy, we will not provide your information to third parties.

#### **(5) International data transfers**

Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this privacy policy.

If you are in the European Union, information which you provide may be transferred to countries which do not have data protection laws equivalent to those in force in the European Union. You expressly agree to such transfers.<sup>9</sup>

#### **(6) Security of your personal data**

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

Of course, data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

You are responsible for keeping your password and user details confidential. We will not ask you for your password.

#### **(7) Policy amendments<sup>10</sup>**

We may update this privacy policy from time-to-time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes.

[We may also notify you of changes to our privacy policy by email.]

#### **(8) Your rights**

You may instruct us to provide you with any personal information we hold about you. Provision of such information may be subject to the payment of a fee (currently fixed at £10.00).

---

9 The internet does not respect national borders, and if you are unsure whether your website or business involves or may involve the international transfer of personal data, it is sensible to err on the side of caution, and allow your users the opportunity to consent to international transfers. In some cases it may be possible to specify the countries to which you will send data.

10 Changes to the policy – in particular as to permissible uses of personal data – may not be retrospective. In other words, if you collect personal information on one basis, you cannot, simply by changing the terms of your policy, go on to legitimately use that information on a different basis.

You may instruct us not to process your personal data for marketing purposes by email (to [mick@spirit-medium.org.uk](mailto:mick@spirit-medium.org.uk) at any time. (In practice, you will usually either expressly agree in advance to our use of your personal data for marketing purposes, or we will provide you with an opportunity to opt-out of the use of your personal data for marketing purposes.)

**(9) Third party websites**

The website contains links to other websites. We are not responsible for the privacy policies or practices of third party websites.

**(10) Updating information**

Please let us know if the personal information which we hold about you needs to be corrected or updated.

**(11) Contact**

If you have any questions about this privacy policy or our treatment of your personal data, please write to us by email to [mick@spirit-medium.org.uk](mailto:mick@spirit-medium.org.uk) or by post to 21 St Lawrence Court, Nantwich, Cheshire, UK CW5 5PB.<sup>11</sup>

This privacy policy is based on a template created and distributed by [www.website-law.co.uk](http://www.website-law.co.uk).<sup>12</sup>

---

<sup>11</sup> You should include a postal address as well as an email address.

<sup>12</sup> Please note that it is a condition of the use of this template that you either: (i) retain this credit and link; or (ii) pay the appropriate licence fee in relation to each website on which the document is used.