

# CALLAGHAN DESIGN Privacy Policy

*Date issued: 17 February 2022*

## 1. About this Policy

1.1 This policy explains when and why we collect personal information about our customers and contacts, how we use it and how we keep it secure and your rights in relation to it.

1.2 We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.

1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website ([www.bluelightning.co.uk](http://www.bluelightning.co.uk)) regularly for any amendments. Amendments will not be made retrospectively.

1.4 We will always comply with the General Data Protection Regulation (**GDPR**) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner ([www.ico.gov.uk](http://www.ico.gov.uk)). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.

## 2. Our contact details

Name: Callaghan Design.

Address: 7 Ramsey Road, Hadleigh, IPSWICH IP7 6AN

Phone Number: +44 (0)1473 823587

E-mail: [keith@bluelightning.co.uk](mailto:keith@bluelightning.co.uk)

## 3. What Information We Collect and Why

### 3.1 The type of personal information we collect

We currently collect and process the following information:

**Identity Data** may include your first name, maiden name, last name, username, marital status, title, date of birth and gender.

**Contact Data** may include your billing address, delivery address, email address and telephone numbers.

**Financial Data** may include your bank account and payment card details.

**Transaction Data** may include details about payments between us and other details of purchases made by you.

### 3.2 How We Collect Your Personal Data

We collect data about you through a variety of different methods including:

**Direct interactions:** You may provide data by filling in forms on our site (or otherwise) or by communicating with us by post, phone, email or otherwise, including when you:

Order our products or services;

Request resources or marketing be sent to you; or

Give us feedback.

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**Boat Shows:** You may provide your data at boat shows for leads purposes only. This data is treated securely from the moment of receiving and transferred to our secure online data software during or directly after the show.

### 3.3 How We Use Your Personal Data

We will only use your personal data when legally permitted. The most common uses of your personal data are:

Where we need to perform the contract between us.

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.

Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email or text message.

You have the right to withdraw consent to marketing at any time by emailing us

at [keith@bluelightning.co.uk](mailto:keith@bluelightning.co.uk)

### 3.4 Purposes for processing your personal data

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please email us at [keith@bluelightning.co.uk](mailto:keith@bluelightning.co.uk) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing</b>
To register you as a new customer	To register you as a new customer (a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including:  (a) Manage payments, fees and charges	(a) Identity  (b) Contact	(a) Performance of a contract with you.  (b) Necessary for our legitimate interests to recover debts owed to us
(b) Collect and recover money owed to us	(c) Financial	us

(d) Transaction  
(e) Marketing and  
Communications

To manage our  
relationship with you  
which will include:

(a) Identity

(a) Performance of a  
contract with you

(a) Notifying you about  
changes to our terms  
or privacy policy

(b) Contact

(b) Necessary to  
comply with a legal  
obligation

(b) Asking you to leave  
a review or take a  
survey

(c) Profile

(c) Necessary for our  
legitimate interests to  
keep our records  
updated and to study  
how customers use our  
products/services

(d) Marketing and  
Communications

To make suggestions  
and recommendations  
to you about goods or  
services that may be  
of interest to you

(a) Identity  
(b) Contact  
(c) Technical  
(d) Usage  
(e) Profile

Necessary for our  
legitimate interests to  
develop our  
products/services and  
grow our business

## 4. How we protect your personal data

4.1 We will not transfer your personal data outside the EU without your consent.

4.2 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.

4.3 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

4.4 For any payments which we take from you online we will use a recognised online secure payment system.

4.5 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

## **5. Who else has access to the information you provide us?**

5.1 We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where we are required to do so by law or as set out in the table above or in paragraphs 5.2 below.

5.2 We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. to print newsletters and send you mailings). We do this for the purpose of our legitimate interests in operating Callaghan Design and for performing our contract with you. However, we disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes. It is possible that third parties may themselves engage others (sub-processors) to process your data. Where this is the case third parties will be required to have contractual arrangements with their sub-processor(s) that ensure your information is kept secure and not used for their own purposes.

## **6. How long do we keep your information?**

6.1 We will hold your personal data on our systems for as long as you are a customer of Callaghan Design and for as long afterwards as it is in the company's legitimate interest to do so or for as long as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims.

6.2 We securely destroy all financial information once we have used it and no longer need it.

## **7. Your rights**

7.1 You have rights under the GDPR:

- (a) to access your personal data
- (b) to be provided with information about how your personal data is processed
- (c) to have your personal data corrected
- (d) to have your personal data erased in certain circumstances
- (e) to object to or restrict how your personal data is processed
- (f) to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at [keith@bluelightning.co.uk](mailto:keith@bluelightning.co.uk) if you wish to make a request.

7.2 You have the right to take any complaints about how we process your personal data to the Information Commissioner:

<https://ico.org.uk/concerns/>

0303 123 1113.

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF

For more details, please address any questions, comments and requests regarding our data processing practices to [keith@bluelightning.co.uk](mailto:keith@bluelightning.co.uk). See section 2 above for contact details.