# Privacy Policy

## 1. Who is responsible for your data

Herringbone is responsible for your data. Our registered address is Thorpe Grange Manor, Thorpe Lane, Almondbury, Huddersfield, HD58TA.

We are the **data controller** of the data we collect from you. It is our responsibility to control the way your personal data is collected and the purposes for which your personal data is used.

We also act as the **data processor** for the data that we collect from you when using Herringbone company website, portal and apps. Where Herringbone client websites, portals and apps collect data, Herringbone is the data processor only.

## 2. How Herringbone use**s** your personal data

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| --- | --- | --- | --- | --- |
| **Data** | **How is it collected?** | **Legal basis for processing** | **What we do with it** | **Where is it stored?** |
| Email address  Name &  Phone number  Business address and company number | Via contact form or email contact or requested in a phone call | Legitimate interest and with your consent. | * To create a secure legitimate record to deal with your request. * To send essential account notifications e.g. invoices, support updates). * To provide support and answer questions via email. | Emerald’s secure cloud database in London, UK |
|  |  | * To provide support via phone and send text message notifications. * To supply correctly worded invoices and contracts |

## 3. Who we share your data with and why

To provide our service we use some sub-processors (listed below) and we may share your data with them. We make sure they adhere to the same standards of data protection that we do. Personal data is never sold to third parties.

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| **Who** | **Why** |
| Emerald Google Rackspace | We use your contact details (email, phone number) to provide you with support for your projects. It means we can respond to your questions via email or phone. We store files such as contracts using Google web services.  We use Rackspace to host our website. Emerald built and support our website |

## 4. Cookies

A cookie is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. Herringbone uses cookies to help us identify and track visitors, their usage of Herringbone website, their website access preferences and to facilitate logged in sessions. Herringbone visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using Herringbone websites, with the drawback that certain features of Herringbone websites may not function properly without the aid of cookies.

## 5. International data transfers and security

We take security extremely seriously and have technologies, processes and security protocols to protect against the loss or theft of personal data. Our security processes include:

* Access Controls – we have physical, system and data access control systems in place.
* Data Backup – we conduct regular backups of the data stored Herringbone.
* Testing & Improving – we regularly test and review our security to continuously strengthen our data security systems.

We will report any breach of Personal Data, and do so as fast as we can; we aim to let people know within 24 hours.

If we do transfer data outside the EEA, we will make sure that it is protected in the same way as if it were being used in the EEA. We will use one of the following safeguards to ensure that it is protected:

* Transfer the data to a non-EEA country which has privacy laws at least as protective as those within the EEA.
* Put in place a contract with the recipient of the data which means the recipient must protect the data to the same standards as required within the EEA, or
* Transfer it to organisations which are part of the Privacy Shield. The Privacy Shield is a framework which sets out the standards for data to be sent between the United States and European countries. The Privacy Shield ensures that data is protected to the same standards as used within the EEA.

## 6. How long we hold your data

We keep your data only for as long as we need it. How long we need data depends on what we are using it for, whether that is to provide services to you, for our own legitimate interests (described above) or so that we can comply with the law. We will actively review the information we hold and when there is no longer a customer, legal or business need for us to hold it, we will either delete it securely or in some cases anonymise it.

## 7. Your rights

You are entitled to see copies of all personal data held by us and to amend, correct or delete such data. You can also limit, restrict or object to the processing of your data.

If you gave us your consent to use your data, e.g. so that we can send you marketing emails, you can withdraw your consent.

You can object to our use of your data where we rely on our legitimate interests to do so. We explained the legitimate interests we rely in the table above under the heading ‘How we use your personal data’.

To raise any objections or to exercise any of your rights, you can send an email to us at jan@herringbone.co. When you get in touch, we will reply you as soon as possible and where possible within one month. We may also ask you to verify your identity before we provide any information to you.

If Herringbone decides to change this privacy policy, the changes will be posted on our website.

## 8. Concerns or complaints

If you have any complaints concerning Herringbone processing of your personal data please email us at jan@herringbone.co. Please note that you have the right to lodge a complaint with the supervisory authority which is responsible for the protection of personal data in the country where you live or work, or in which you think a breach of data protection laws might have taken place.