**Privacy and Cookies Policy**

This policy explains how we, The Cyclists of Stamford (a brand of Thinking Differently Limited, 33 Manor Farm House, High Street, Ketton, Stamford, Rutland, PE9 3TA), use your personal data which you provide to us including when you use our website, www.thecyclistsofstamford.com. We take our responsibilities for managing your personal data seriously.

When we say your “personal data” or “personal information” we mean any information that identifies you as a person.

You can read more information about how we process your personal information by clicking on the various sections below.

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*Collecting your personal data – our relationship with you*

You may provide us with personal data in one of the following ways:

1. contacting us by telephone or in person where you may provide your contact details such as your name, telephone number and email address. You will also be asked to consent to our using your information; or
2. contacting us through our website by using one of the options on our website which requires you to provide us with your personal information*;* or
3. in surveys.

Examples of the personal data we collect include your name, your email address, contact and/or employee names; and any correspondence when you contact us. It could also include your bank account details and payment details (if it identifies a person). The collection of this personal data is essential to enable us to perform our contract with you.

One of our team may, in the course of assisting you with a query or when we provide services to you, ask for your consent to use your details for further purposes such as marketing and other promotional activities. When we do this you will be clearly advised and your specific consent will be required before we can use your information for such activities.

*What we do with your personal information*

**Providing our services to you:** - we use your personal information to open your account with us and to contact you about the goods that we are providing to you. Reminders and updates will be sent to you using the contact information that you provide to us. Without your personal contact information, it is difficult for us to provide our services to you

**Improving our services:** - we may analyse your personal information in order to improve our business, our website and customer services.

**Marketing:** - we may use your personal information to contact you about promotions and other news and information about our business.

*Sharing your personal information with third parties*

In order to provide our services and operate our website, we use various third parties which are carefully selected by us. These parties include companies which provide business functions such as email, marketing assistance, accounting, payment processing, data management and website support. All of these third parties have in place policies and procedures to ensure adherence to the General Data Protection Regulation (‘**GDPR**”). In some circumstances, your data may be transferred to or stored at a location outside the European Economic Union (“**EEA**”) and processed by individuals acting for one of these third parties. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and the GDPR. Where it is necessary to process data outside the EEA, we will ensure that the relevant third party processing the data has either provided the required contractual undertakings as specified by the EU or is a signatory of the EU-US Privacy Shield Framework.

There are certain scenarios where we may have to share your personal information with other parties and examples of these scenarios are set out below:

* For legal reasons, we may be required to share your data with law enforcement agencies, governments, etc. This may be as part of an investigation, or it may be to prevent fraud prevention.
* Where your data may be required to protect against harm to the rights of property or person as permitted by law.
* Where your data may be required to prevent or protect against serious physical harm to an individual.
* If we are involved in an acquisition, a merger, sale of assets, or liquidation. If this circumstance arose, appropriate undertakings would be obtained from the third party.

*Cookies - what are they and how do we use them?*

Personal information may also be collected automatically using cookies. Cookies are small files that are automatically saved to your device as a result of the websites you visit. Cookies track, save and store information. Cookies may enable us or a third party to recognise you and make your next visit easier, and our services more useful to you, by giving you tailored options based on the information that has been stored from your last visit. Cookies are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the web site.

We use the following cookies on our web site: [*a description of all of the cookies which you use on your website should be inserted*]

*Google Analytics* - The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>. Google's privacy policy is available to read at <http://www.google.com/policies/privacy/> .

Session cookies: [*please insert a description of any session cookies which are used on the website*].

Most browsers allow you to reject all cookies, whilst some browsers allow you to reject just third party 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. Blocking all cookies will, however, have a negative impact upon the usability of many websites, including this one. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

*Access to your personal data – your rights and contacting us*

**Access to the personal data we hold on you:** You have the right to ask us for a copy of the personal information we hold on you, a “*subject access request*”. There is no fee for this. However, requesting subsequent copies of such information within an unreasonably short period may be chargeable.

**Right to rectify or erase your personal data:** You also have the right to have any inaccuracies corrected or removed and in certain circumstances you may ask us to erase your personal data. If you would like us to erase the personal data we hold about you, please get in touch specifying why you would like us to do so.

**Right to withdraw consent:** If you have given us consent to use your personal details you may withdraw this consent at any time by emailing john.dawson@thinkingdifferentlylimited.com.

**Right to limit processing your data:** You may also instruct us to cease processing your data if no longer relevant, or if there are no other legal or contractual obligations for us to do so.

If you have any enquiries and/or wish to exercise any of your rights in this privacy policy please contact us by emailing john.dawson@thinkingdifferently.com.

You also have the right to make a complaint about our data processing activities to the Information Commissioner’s Office. Further details can be found at <https://ico.org.uk>.

*Retention of Data*

We hold your personal data only for as long as is necessary for the specified purpose. Once you have closed your account with us we will delete all of the information that we hold on you apart from your email address which we will hold on our marketing database. We will also keep invoicing and other accounting records which are necessary to satisfy HMRC.

*Other Websites*

Our website may have links to other websites. This Privacy Policy only applies to this website. You should therefore read the privacy policies of the other websites when you are using those sites.

*Updates*

This Privacy Policy is reviewed by us on a regular basis and may be updated from time to time. Please ensure that you are familiar with these changes.

Last updated 21/06/2020.