## PRIVACY AND COOKIES POLICY

Version HR07 – Last updated 04.10.22



# **Data Protection Policy**

This policy explains how we use any personal information we collect about you when you use our services, Incorporating the GDPR regulations.

#### Who we are

Our website address is: https://clever-works.co.uk.

#### Comments

When visitors leave comments on the site, we collect the data shown in the comments form, and also the visitor's IP address and browser user agent string to help spam detection.

An anonymised string created from your email address (also called a hash) may be provided to the Gravatar service to see if you are using it. The Gravatar service Privacy Policy is available here: https://automattic.com/privacy/. After approval of your comment, your profile picture is visible to the public in the context of your comment.

### Media

If you upload images to the website, you should avoid uploading images with embedded location data (EXIF GPS) included. Visitors to the website can download and extract any location data from images on the website.

#### Cookies

If you leave a comment on our site you may opt in to saving your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year.

If you visit our login page, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.

When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select "Remember Me", your login will persist for two weeks. If you log out of your account, the login cookies will be removed.

If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after 1 day.

Embedded content from other websites

Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

How long we retain your data If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognise and approve any follow-up comments automatically instead of holding them in a moderation queue.

For users that register on our website (if any), we also store the personal information they provide in their user profile. All users can see, edit, or delete their personal information at any

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time (except they cannot change their username). Website administrators can also see and edit that information.

What rights you have over your data

If you have an account on this site, or have left comments, you can request to receive an exported file of the personal data we hold about you, including any data you have provided to us. You can also request that we erase any personal data we hold about you. This does not include any data we are obliged to keep for administrative, legal, or security purposes.

### Where we send your data

Visitor comments may be checked through an automated spam detection service.

We collect information about you when you:

- request a quotation
- place an order
- make payment
- complete registration

When you request a quotation or place an order through our website, or via the telephone we collect your name, address, phone number, email address and the type of service that you are interested in.

When you make an online payment, the payment details could be recorded by the payment provider on our behalf.

During registration, depending on the type of service you have ordered, we may collect your home and business address, phone number and email address. When we need to verify identity, we may request date of birth, identifying numbers (e.g. passport number) and copies of identity documents of individuals who will use the service.

Once the service is set up, we record when we have sent on letters or messages.

We keep a record of your email correspondence with us, and any action notes arising if you phone us or speak to us in person.

We will share relevant details with our suppliers so that we can set up various aspects of your service. For example, for a personalised phone answering service, we would tell the call-centre your name and the name of your business.

We shall use third-party services to provide us with communications, database, financial, data storage and backup facilities where we remain in control of the data and can be assured of its security and privacy while being processed. We may make temporary copies of your data to aid transfer between systems.

We will comply with authorised requests to disclose information to law enforcement agencies. We will not sell or share your information for other companies to carry out their marketing.. Visitor comments may be checked through an automated spam detection service.

## How will we use the information about you?

We collect information about you to quote for a service, process your order, obtain payment, verify your identity, and set up the service according to your preferences.

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When you have requested a quotation, or begun to place an order, we will keep a record of your contact details and preferences in anticipation that you may take up the service. During initial payment, you may choose a form of subscription. We will use the method you have opted to take repeat payments when these are due.

Following payment, we will obtain additional information from you to:

- verify your identity (where we are legally obliged to do this, for example under Money Laundering Regulations)
- set up your service according to detailed preferences

Any personal information that you have provided for the purposes of the identity check will be kept on file but not used otherwise.

Once you are using our services, we will use your email address to invoice you. If receiving forwarded mail, we will use your verified postal address to send your post. If using phone answering, we will use the mobile

number or email address which you have specified to text or email your messages. If using telephone forwarding, we will use the phone number which you have specified to route phone calls.

We may produce internal reports aggregating data to help us administer and manage our business.

## **Marketing Preference**

If you agree we shall occasionally email you our news and special offers. You may opt-out at any time.

## Your Rights

You have the right to receive a copy of our records about you, before, during and after the termination of your service. You have the right to request an amendment or correction of your records while we hold them.

You have the right to be removed from our records up until we have begun providing your service.

Once you have begun receiving a service, we must keep certain records to comply with legislation specific to our business area.

If you terminate your service, we will no longer use your data, but in most cases must keep a record of it for a period of five years after this date.

### Changes

This policy will be available on our website. This copy was last updated in October 2022.