



## **Commentary Charts Privacy Policy**

### **INTRODUCTION**

- 1.1. Commentary Charts respects your privacy and is committed to protecting your personal data. This Privacy Policy will tell you how we look after your personal data when you visit our website and inform you of your privacy rights and how the law protects you.
- 1.2. This Privacy Policy aims to give you information on how Commentary Charts collects and processes your personal data through your use of this website, including any data you may provide through the website when you sign up to receive our marketing material, purchase a product or service, or take part in a competition.
- 1.3. This Privacy Policy (including any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us when using the Commentary Charts website <https://www.commentarycharts.com/> (our "Site"). Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.
- 1.4. Commentary Charts is the data controller and responsible for your personal data (collectively referred to as, "we", "us" or "our" in this Privacy Policy).

### **2. HOW TO CONTACT US**

- 2.1. Our full details are:
  - 2.1.1. Full name of legal entity: Commentary Charts Limited
  - 2.1.2. Postal address: Commentary Charts, PO Box 3212, Reading, RG1 9JW
  - 2.1.3. You can also contact us through our customer services email [commentarycharts@yahoo.com](mailto:commentarycharts@yahoo.com)

### **3. YOUR DATA**

- 3.1. In this policy, personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
- 3.2. We may collect, use, store and transfer different kinds of personal data about you which we have described as follows:
  - 3.2.1. Identity Data including your first name and last name.





- 3.2.2. Contact Data means the data we use to contact you including your billing address (if you purchase a product through PayPal), delivery address, email address and telephone number.
- 3.2.3. Financial Data means the payment method and card association used to process your payments for your orders. We do not store or process your card details ourselves. These are processed and stored on one of our contracted third-party service providers. We encrypt your payment card details in your browser and securely transfer this data to our relevant third-party payment provider to process a payment.
- 3.2.4. Transaction Data means details about transactions you have made on our website including the payments to and from you along with other details of products and services you have purchased from us.
- 3.2.5. Technical Data means details about the device(s) you use to access our website including your internet protocol (IP) address, browser type and version, location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- 3.2.6. Profile Data includes your username (email address), your login data, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- 3.2.7. Usage Data includes information about how you use our website, products and services. This includes your browsing patterns and information such as how long you might spend on one of our webpages and what you look at and for on our website, the page that referred you to our site and the click stream during your visit to our website, page response times and page interaction information (clicks you make on a page).
- 3.2.8. Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.

#### **4. HOW YOUR PERSONAL DATA COLLECTED**

- 4.1. We use different methods to collect data from and about you.
- 4.2. You may give us your Identity Data, Contact Data, Transaction Data, Profile Data, Financial Data and Marketing and Communications Data by using our website, filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - 4.2.1. purchase a product or service through our website;





4.2.2. contact us; or

4.2.3. give us feedback.

4.3. As you interact with our website, we may automatically collect Usage Data and Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, plug ins, server logs and other similar technologies. Please see section 11 for further details.

## **5. HOW WE USE YOUR PERSONAL DATA**

5.1. We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

5.1.1. Operating our website;

5.1.2. Providing our services;

5.1.3. Performing the contract we are about to enter into or have entered into with you;

5.1.4. Processing information relating to transactions or purchases of our products, including your contact details. Any transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions;

5.1.5. contacting you in relation to the service and effectively manage our relationship with you;

5.1.6. enabling us to ensure efficiency and security of our systems (e.g. prevention of unauthorised access) and make improvements where necessary, including for user experience of the website;

5.1.7. making business decisions about the provision of services and our website;

5.1.8. complying with a law that applies to us.

## **6. LEGAL BASIS FOR PROCESSING**

6.1. We may process your personal data on the basis of your consent and/or if it is necessary for our legitimate interests, namely to keep records of user experiences, provide the information you have requested, improve our services, ensure our services remain accurate and up to date, study how our website is used and popular content, for marketing strategies/communications and to maintain and grow our business.

6.2. We do not use your personal data for activities where our interests are overridden by impact on you (unless we have your consent or are otherwise permitted to





do so by law).

- 6.3. Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.
- 6.4. We also process data as required by law, including, to comply with legal obligations such as security obligations in data protection legislation (such as prevention of unauthorised access).

## **7. HOW LONG WILL WE USE YOUR DATA FOR**

- 7.1. We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for (see section 5 above), including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
- 7.2. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.
- 7.3. By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers.

## **8. IF YOU FAIL TO PROVIDE PERSONAL DATA**

Where we need to collect personal data by law, or under the terms of an agreement we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, where you do not provide suitable delivery instructions to provide you with goods or services). In this case, we may have to cancel a product or service you have with us. We will notify you if this is the case at the time.

## **9. YOUR INFORMATION AND COUNTRIES OUTSIDE EUROPE**

To deliver products and services to you, it is sometimes necessary for us to share or store your data outside of the European Economic Area. This will typically occur when service providers are located outside the EEA or if you are based outside the EEA.



## 10. YOUR RIGHTS

- 10.1. You have rights relating to your personal information, including the following:
- 10.1.1. To be informed about how your personal information is being used;
  - 10.1.2. To access the personal information we hold about you;
  - 10.1.3. To request the correction of inaccurate personal information we hold about you;
  - 10.1.4. To request that we delete your data, or stop processing it or collecting it, in some circumstances;
  - 10.1.5. To stop direct marketing messages, and to withdraw consent for other consent-based processing at any time;
  - 10.1.6. To request that we transfer or port elements of your data either to you or another service provider; and
  - 10.1.7. To complain to your data protection regulator — in the UK, the Information Commissioner's Office.
- 10.2. If you wish to exercise any of the above rights, please contact us at [commentarycharts@yahoo.com](mailto:commentarycharts@yahoo.com). We may withhold personal information that you request to the extent permitted by law.

## 11. COOKIES

- 11.1. When you access our website cookies will be created. Cookies are small text files that are stored on your device when you visit a website. Cookies are used for a variety of reasons including to ensure the website can function, to improve their efficiency, to recognise you when you return to the site and to make improvements to content.
- 11.2. There are four types of cookies that are created when you visit our website:
- 11.2.1. Strictly Necessary Cookies – These cookies enable us to provide you with our website and allow you to use its features
  - 11.2.2. Analytic or Performance Cookies – These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
  - 11.2.3. Functionality Cookies – These cookies allow our website to remember the choices you make when you visit our websites including language preference





- 11.2.4. Targeting Cookies -These cookies record your visit to our website, the pages you have visited and the links you have followed. This information will allow for targeted advertising to be displayed which may be more relevant to your interests.
- 11.3. We use Google Analytics to collect Performance Cookies on our behalf. Please note that twitter and Instagram also use cookies, over which we have no control. Twitter and Instagram may include, for example, advertising networks and providers of external services like web traffic analysis services. You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including strictly necessary cookies) you may not be able to access all or parts of our website. You can opt out of being tracked by Google Analytics across all websites. For further information click here. <http://tools.google.com/dlpage/gaoptout>
- 11.4. The table below provides further information about the cookies created when using our website.

Cookie	Description	Duration	Type
_ga	This cookie is installed by Google Analytics. The cookie is used to calculate visitor, session, campaign data and keep track of site usage for the site's analytics report. The cookies store information anonymously and assigns a randomly generated number to identify unique visitors.	2 years	Analytics

#### 11.5. Facebook Pixel Use

We use the "Facebook Pixel" from Facebook Inc (1 Hacker Way, Menlo Park, CA 94025, USA, or, if you are based in the EU, Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook")) on our website. This allows user behavior to be tracked after they have been redirected to the provider's website by clicking on a Facebook ad. This enables us to measure the effectiveness of Facebook ads for statistical and marketing purposes. The data collected in this way is anonymous to us, i.e. we do not see the personal data of individual users. However, this data is stored and processed by Facebook, which is why we are informing you, based on our knowledge of the situation. Facebook may link this information to your Facebook account and also use it for its own promotional purposes, in accordance with Facebook's Data Usage Policy <https://www.facebook.com/about/privacy/>. Facebook can use cookies and other storage technologies to collect and receive information from the business's website, which we may use to retarget adverts to you on Facebook and Instagram.

You can allow Facebook and its partners to place ads on and off Facebook. A cookie may also be stored on your computer for these purposes. The legal basis for the use of





this service is Art. 6 paragraph 1 sentence 1 letter (f) GDPR. You can object to the collection of your data by Facebook pixel, or to the use of your data for the purpose of displaying Facebook ads by contacting the following address:

<https://www.facebook.com/settings?tab=ads>.

We would like to remind you that you have the right to opt-out of the data collection and use of this personal data for uses such as retargeted adverts on Facebook and Instagram. You can deny use of cookies <https://www.commentarycharts.com/terms-conditions/>

## **12. SHARING YOUR INFORMATION**

12.1. We do not sell any of your personal data to any third party. However, providing our services to you requires sharing your information with carefully selected third parties, as set out in this statement:

- 12.1.1. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.
- 12.1.2. Information required to fulfil your order will be shared with our delivery companies.
- 12.1.3. Transactional messages will be sent via third-party services who may retain records for reporting purposes.
- 12.1.4. We may also provide third parties with anonymised information and analytics about our customers, which will not identify any individual.
- 12.1.5. We may share your personal data to professional advisors acting as processors or joint controllers including lawyers, bankers or insurers who provide services to us.
- 12.1.6. We may share your personal data to HM Revenue & Customs and other regulators and authorities acting as processors or joint controllers based in the United Kingdom.
- 12.1.7. Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.



- 12.2. The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.
- 12.3. This website may include links to third-party websites, plug-ins and applications, for example Big Cartel, Instagram and Twitter. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

### **13. AUTOMATED DECISION MAKING (“ADM”)**

ADM occurs when decisions are made about you by a computer or some other information analysing machine. Examples of this include the machine scanning of CVs, computer processed aptitude or personality tests and website profiling. We do not use ADM.