

Privacy Policy

v.2

Key details

EMILYPB, FINE ART AND ANTIQUES CONSULTANT, Mansfield House,
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Introduction

EMILYPB understands that the information you trust us with is important to you, and we are committed to protecting and respecting your privacy. This policy explains how, when and why we collect your personal information during the course of providing services to you, under what situations we may disclose your personal information to others, and how we keep it secure.

Why this policy exists

This privacy policy ensures EMILYPB:

- Complies with data protection law and follows good practice;
- Protects the rights of staff, customers and partners;
- Is open about how it stores and processes individuals' data;
- Protects itself from the risks of a data breach.

We provide this information in a way that is:

- concise
- transparent
- intelligible
- easily accessible
- uses clear and plain language

Summary

- EMILYPB acts as a Controller and Processor of data.
- We only collect personal information about you where it is necessary to provide a business service or product; or you have consented, and we ensure that we only collect information that we need.
- We will not send you marketing material unless you have given us permission to do so.
- We will not sell your personal information to third parties.
- We use third-party suppliers to help us provide an excellent service to you. Where we share personal information with those suppliers, we will seek your agreement to do so and we will have the appropriate controls in place, which will assess the security of their processing arrangements.
- We will protect your personal information with an appropriate combination of technical and organisational measures.
- You have rights to your information. These are detailed in Section 8. We retain your data for as long as is necessary. If you have a complaint, please see how to contact us in Section 11
- If you have any questions about how we process your information, please see how to contact us in Section 13.

1. What Information do we collect about you?

We need information about you to offer our range of services or to supply products. We need to collect information from you to do this and to offer you the right product for your circumstances. This can include personal information about you and other people involved in fulfilment of the business dealings with you.

Information we may collect about you:

Your full name (and any other nominated person)	Source: Personal information may be given by a source close to the client, for example a family member. If this is the case, ID or Power of Attorney will be asked for and check to verify the relationship to the client
Your telephone number(s)	Ditto
Your physical address(es)	Ditto
Your email address(es) Skype or Zoom name	Ditto
And any other online identities you wish to share	Ditto
Information about why you require our help	Ditto
Bank details	Ditto

Third party details such as solicitor or insurer, auctioneers, dealers, removal firms, professional packers, restorers and conservators, art or antique specialists. Any contractors in relation to selling or buying art. Any necessary contractors relating to house clearing or moving home.	Ditto
Photographs or lists of objects around your house and property which are potentially identifiable.	Photographs taken by Emily Pelham Burn or given to her by the client or source close to the client as necessary to fulfil the service.

2. Why we use the information about you

We collect your personal information for a few reasons: to provide you with a quote; administer your business dealings with us; improve the products and services we offer; and inform you of other products or services that may interest you.

To process your information, we mainly rely on the following legal bases:

Performance of a contract: The use of your information is necessary to perform the contract that you, or a business you work for, has with us. Any **testimonials or featured customer stories** you have given us permission to use would also be with your consent by email. All the **personal information that you provide to us** is held in our secure software which is provided and supported by a third party. We endeavour to ensure that your personal information is maintained and updated correctly. It is your duty to inform us of any changes to your personal information to ensure that it is up to date.

Legitimate interests: We may use your information for our legitimate interests, such as to provide you with the most suitable services, products, website experience, emails or newsletters, or to improve and promote our products and services, along with administrative and legal purposes. Examples of any legitimate interests pursued by us, or third parties we use, are as follows:

- Unnecessary privacy consent requests to avoid 'consent fatigue'.
- Reasonable expectation to undertake contractual tasks.
- Fraud prevention.
- Network and information security.
- Indicating possible criminal acts or threats to public security.
- Any request to provide information in accordance with the law.

Consent: We may rely on your consent to use your personal information for certain products or services, and for direct marketing purposes. You may withdraw your consent at any time, please contact us using the details

provided at the end of this policy. Consent will be reviewed periodically to ensure it is still relevant.

3. Information that we share

We often have to share your information with third-party service providers, including auctioneers, dealers and other partners, in certain circumstances.

4. Marketing

We may from time-to-time send you information of interest to you. We will do this as part of our contract with you to provide products or services. We will not engage in Marketing activities out with this remit. If you do not want to receive information of interest, then you have the right to request them to stop.

5. Information security

We work hard to keep your data safe. We use an appropriate combination of technical and organisational measures to ensure, as far as reasonably possible, the confidentiality, integrity and availability of your information at all times. If you have a security-related concern, please contact us using the contact details at the end of this policy.

6. Transferring your information outside of the European Economic Area (EEA)

EMILYPB does not have a requirement to transfer your personal data to countries outside the European Economic Area (EEA). Where there is a legitimate requirement to do so, this will only be done after receiving your explicit consent to do so and ensuring any country has similar data protection laws to the UK.

7. Information we collect through your use of our website

We may collect information using cookies and similar technologies, to produce anonymised Google Analytics data to improve the website experience.

8. Access to your information and correction

- You have the right to request a copy of the information we hold about you. We will provide you with this information within 1 month of receiving your request and verifying your identity unless such data is restricted by law. Verification will require the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport or driving licence certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

- You also have a right to contact us if you believe your personal information is incorrect, or if you believe we are no longer entitled to use your personal data.
- If you have any questions about how we use your personal information, please contact us using the details provided at the end of this policy.

Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to judicial review: in the event that EMILYPB refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 11 below.

9. Retaining your data

EMILYPB, and the information we collect about you, are subject to various regulatory and legislative requirements. In addition, we will endeavour not to keep your personal information for longer than we should for us to fulfil our obligations to you. Where it is not possible for us to delete your data, we will ensure the appropriate security and organisational measures are put in place to protect the use of your data. We use multi-factor authentication on certain services where information is stored for extra protection. We will hold your personal data for differing periods of time depending upon the reason we have for processing it as detailed in our data retention policy which is available on request via the contact details shown in Section 13 of this policy.

Type of Record Retention	Period
Active client data file	Indefinitely
Past client data file	7 years
Enquiry client data file	1 year
Suppliers	Indefinitely
Employees	Indefinitely

10. Clients' data

We will only collect such Personal Data that is necessary for us to perform our services and we ask our clients only to share such Personal Data as required for that purpose. Where we identify that a client has provided us with unnecessary Personal Data we will either return that information to its source or destroy it, taking into account our client's preference wherever possible. Generally, we collect Personal Data from our clients or from third parties acting on the instructions of the relevant client. Examples of this collection include when:

- we are contacted about our services;
- a proposal is requested from us in respect of the services we provide;
- our clients engage us to provide our services and also during the provision of those services;
- from third parties (e.g. agents or contacts of our clients, or from corporate entities).

11. Complaints

We work hard to ensure that your personal information is treated safely and securely. However, if you have a complaint about how your personal data is being processed by EMILYPB (or third parties as described in 9. Above), write to us using the contact details at the end of this policy, or talk to us. You also have the right to lodge a complaint with the Information Commissioner's Office.

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

12. Changes to our Privacy Policy

We review our Privacy Policy regularly and will place any updates on our website and in relevant policy communications.

13. Who to contact in relation to processing of personal information at EMILYPB

EMILYPB controls the processing of personal data on its systems. If you would like to discuss anything in relation to this policy or how we handle your personal information, you can reach EMILYPB by writing to:

EMILYPB, Mansfield House, Strathmiglo, Cupar, Fife KY14 7QE or via email info@emilypb.co.uk or you can also talk to us on tel. no. 07821 897 371.

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