



PRIVACY STATEMENT

Last updated 25 May 2018

The General Data Protection Regulation (GDPR) became enforceable from 25 May 2018. The new law gives new rights to individuals and asks that we provide information about how we process data in a clear and transparent way. This Privacy Statement explains how we collect, store and use personal data. When we refer to “we”, “us” or “our” in this Statement we mean Finely FettleD Limited.

Finely FettleD Limited is a direct marketing consultancy which helps organisations create targeted marketing campaigns by helping with strategy, design, creative, print, postage and data capture.

Our company registration number is 9222299 and our VAT registration number is 200111014.

This Privacy Statement applies to personal data collected by Finely FettleD, where you provide personal data to us face to face, on the telephone, or on our website. It also refers to our processing of your personal data where it is on The UK High Net Worth Database. All this data has been confirmed as fairly obtained and is used to support direct marketing activity, confirmed as a legitimate interest under GDPR.

Where you provide personal data to us face to face, on the telephone, or on our website it is processed at our registered office: Finely FettleD Limited, 46 Hawkcliffe View, Silsden, Keighley BD20 0BS.

How to contact us

If you have any questions about this Privacy Statement or would like to contact us about any other matter, please use the following contact information:

Email: contact@finelyfettleD.co.uk

Address: 46 Hawkcliffe View, Silsden, Keighley BD20 0BS

How we collect your personal data

We collect personal data in the following ways:

- When you provide your contact details to us when requesting information about our products or services, either via the telephone, our online enquiry forms or face-to-face.
- Via openly available public sources (e.g. LinkedIn or company websites).
- When you sign up for reports, newsletters or other downloads on our websites.



- We offer our clients access to a database of individuals, known as the UK High Net Worth Database, in partnership with third party data partner, with whom we have a data processing agreement that determines the elements used as part of that database and the way it can be used.

This data is fairly obtained and prior to release to clients it is always matched against industry data suppression files helps us from using personal data of a recently deceased individual, or someone known to have moved recently, or someone who has opted-out of their data being used for correspondence by clients, or someone who has registered their details with the Mailing Preference Service.

We use this personal data in order for us to provide data for correspondence or the other marketing services under our Legitimate Interest. We work with a data partner who collects and stores your personal data for correspondence purposes and detailed service provision. Together, we are especially committed to ensuring that the information collected and used is appropriate for this purpose, and does not constitute an invasion of your privacy.

Any third parties that we may share your data with are obliged to keep your details secure and to use them only to fulfil any service to which we contract them. When they no longer need your data to fulfil this service, they will dispose of the details in line with our procedures.

The types of personal data we collect

The personal data we routinely collect includes:

- Full name
- Email address
- Postal address
- Telephone number
- Job title
- Company name
- Contact details occasionally (e.g. Skype address, Twitter, Facebook)

We do not collect any special categories of personal data, as defined under the GDPR. Our products and services are not aimed at children.

How we use your personal data

Purpose	Lawful basis for processing
Your personal data we collect	
To fulfil a query, request for services and/or to administer our services	For the performance of a contract or agreement
To maintain records of prospective, current and past clients and our suppliers	Our Legitimate Interests, which we have balanced with the interests of our clients, suppliers and business contacts
To contact you to ask if you might be interested in the support of our services for your upcoming marketing campaigns	Our Legitimate Interests, which we have balanced with the interests of our clients, suppliers and business contacts
To track your use of our websites (see our Cookie Notice below).	Our Legitimate Interests, which we have balanced with the interests of our clients, suppliers and business contacts
Your personal data on The UK High Net Worth Database	
To provide your personal data to third parties who wish to correspond with you and who have confirmed legitimate interest to do so	Our Legitimate Interests, which we have balanced with the interests of our clients, suppliers and business contacts

Your rights regarding your personal data

You have a number of rights under data protection law, which have been strengthened under the General Data Protection Regulation (GDPR):

Access: You have the right to access the personal data we may hold about you and the purposes for which we are using it. We may ask for proof of your identity. On receipt of such a request we will endeavour to respond to you as soon as possible, at most within one calendar month.

Rectification: You have the right to request that we amend any personal data which is incorrect or requires updating.

Erasure: You have the right to request that we delete any personal information pertaining to you. We will assess any deletion request on a case by case basis and will endeavour to respond to you as soon as possible, at most within one calendar month.

If you would like to exercise any of these rights, please use the following contact details:

Email: contact@finelyfettled.co.uk
 Address: 46 Hawkcliffe View, Silsden, Keighley BD20 0BS

If you are concerned about the manner in which we have collected and used your personal data, please contact us using the contact details above – we will do our best to help. If you



are unhappy with the way in which we have handled your personal data you have the right to contact the Information Commissioner's Office.

Where we store your personal data

We store and process your personal data at our registered offices at 46 Hawkcliffe View, Silsden, Keighley BD20 0BS. The UK High Net Worth Database is stored securely in Warrington with our data partner.

How we keep your personal data secure

Finely Fettledd takes the protection of your personal data very seriously and we take appropriate steps to ensure your personal data is stored in a secure environment to prevent any unauthorised access.

Finely Fettledd may use external data service providers to process personal data on our behalf. When we do so we have appropriate agreements in place to protect the data. Any data transfers between external service providers and ourselves are conducted by secure means. Where such service providers are located outside the EEA we have additional contractual arrangements in place.

Sharing of your personal data

Excepting your personal data within The UK High Net Worth Database, which is designed for us to supply third parties who have a legitimate interest in corresponding with you, we will not share your personal information, otherwise collected, with any third parties for them to use for their own marketing purposes. We may disclose your personal data if required to do so by law.

How long we store your personal data for

We will only retain personal data for as long as is necessary for the purposes we are using it for. How long we retain data will vary depending on the purposes it is used for.

External Links

Please remember that if you use a link to go from our websites to another website, or you request a service from a third party, this Privacy Statement will no longer apply once you have left this website. Your browsing and interaction on any other website is subject to that website's own rules and policies.



Updates to this Statement

We review and update this Statement regularly to take account of changes to our processing and regulatory changes. We encourage you to review it from time to time. If we make any significant changes to this Statement, we will endeavour to communicate this to you where possible.

Cookie Notice

We use cookies to operate our websites and understand how visitors use our websites. We will update this Notice if change the cookies we use.

What is a cookie?

Cookies are text files which contain information about your internet usage that is held in your browser or on your computer's hard drive. There are different types of cookie: some are essential for the site to operate properly, whereas others are aimed at enhancing and personalising your user experience. Cookies can help us to understand how consumers are interacting with our website, which helps us to improve our site and to deliver a better service to you.

What types of cookies do we use?

Strictly Necessary Cookies

These cookies are essential to enable you to move around the website and use its features. Without these cookies, we cannot provide some of the basic functionalities of our website.

Performance Cookies

These cookies generally collect information about how visitors use our website, for instance which pages visitors go to most often, and the pages that they don't. This helps us to understand and improve the site, so it is easy to use and includes helpful content. They also allow us to fix bugs or glitches on the website. These cookies don't collect information that identifies visitors, so we can't identify you individually.

We use Google Analytics to track usage of our websites. For example, to see what content you click on, so we can analyse what content is of most interest to our audience.

Functionality Cookies

These cookies allow our website to remember the choices you make as you browse the site. They provide more enhanced and personal features. The information collected is anonymised and they cannot track your browsing activity on other sites once you leave our site.



How to turn off cookies

You can turn cookies off at any time, by going into your browser settings, however this may have a detrimental effect on your user experience. If you are happy to continue letting us use cookies in the ways set out in this Notice, to help us guide our work, then you need not do anything. If you have any concerns about the cookies we use, please contact: contact@finelyfettled.co.uk

Thank you

We are a small business and we genuinely care about our clients and the people they provide services to. We always wish to do this in the most appropriate, relevant and respectful way that provides value to you.

Thank you for your consideration.