**Privacy Statement**

This Privacy Statement was published August 29th, 2020.

We are committed to protect and respect your privacy in compliance with EU- General Data Protection Regulation (GDPR) 2016/679, dated April 27th 2016. This privacy statement explains when and why we collect personal information, how we use it, the conditions under which we may disclose it to others and how we keep it secure. This Privacy Statement applies to the use of our products and services and to our sales, marketing and customer contract fulfilment activities. It also applies to individuals seeking a job in Domestic-Chef Limited.

**Who are we?**

Norman Wilkinson is an author with a website that is designed to collect reader subscriptions to monthly newsletters and other marketing information, delivered electronically by email only.

Address: 1 Mount View Close, Gerrans, Cornwall TR2 5DS.

**When do we collect and process personal data about you?**

* When you interact with us in person, through correspondence, by phone, by social media, or through our websites. This also includes when you interact with us as a representative of a company, such as entering into a contract with us, contacting us for support or other issues. Note that we do not transfer personal data from the social media and process the personal data in any other way outside the social media platform.
* When we collect personal information from other legitimate sources, such as third-party data aggregators, marketing partners, public sources or social networks. We only use this data if you have given your consent to them to share your personal data with others.
* We may collect personal data if it is considered to be of legitimate interest, and if this interest is not overridden by your privacy interests. Before data is collected we make sure an assessment is made, ensuring that there is an established mutual interest between you and the Cayenne Kitchen.

**Why do we collect and use personal data?**

We collect and use personal data mainly to perform direct sales, direct marketing and customer service. We also collect data about suppliers, partners and persons seeking a job or working in our company.

We may use your information for the following purposes:

* Send you marketing communications which you have requested. These may include information about our products and services, events, activities, and promotions of our associated partners’ products and services. This communication is subscription based and requires your consent.
* Customers will by default receive subscriptions, but can choose to opt-out at any time.
* Send you information about the products and services that you have purchased from us.
* Perform direct sales activities in cases where legitimate and mutual interest is established.
* Provide you content and venue details on a webinar or event you signed up for.
* Reply to a ‘Contact me’ or other web forms you have completed on one of our websites.
* Follow up on incoming requests (customer support, emails, chats, or phone calls).
* Perform contractual obligations such as order confirmation, invoice, reminders, and similar. The contract may be with Domestic-Chef Limited directly or with an authorised business partner. If the contract is entered into directly, the contract may be entered into digitally for more efficient contract and customer handling, including to meet with legal requirements.
* Notify you about any disruptions to our services (system messages).
* Contact you to conduct surveys about your opinion on our products and services.
* Recruitment and processing job applications.

**Our legal basis for collecting personal data**

 **Collecting personal data based on consents**

The collection of personal data based on consent from the data subject, will be done by using “Consent Forms” that will store documentation related to the consent given by the individual. Individual consents will always be stored and documented in our systems. We may send digital marketing to persons whom have consented, such as marketing by email.

**Collecting personal data based on contracts**

We use personal information for fulfilling our obligations related to contracts and agreements with customers, partners and suppliers.

**Collecting personal data based on legitimate interest**

We may use personal data if it is considered to be of legitimate interest, and if the privacy interests of the data subjects do not override this interest. Normally, to establish the legal basis for data collection, an assessment has been made during which a mutual has been identified. This legal basis is primarily related to our sales and marketing purposes, and we may send information on products and services to our customers based on legitimate interest. We will always inform individuals about their privacy rights and the purpose for collecting personal data.

**What type of personal data is collected?**

We collect name, phone number, title and email address, in addition to your company’s name and contact information. If you are a representative for your company, we process your personal contact information with regard to the company. When entering into a contract with us, the signature may be made electronically comprising the processing of your personal data. We may also collect feedback, comments and questions received from you in service-related communication and activities, such as meetings, phone calls, documents, and emails. From our websites we may collect IP-address and actions taken on the site.

If you apply for a job, we collect the data you provide during the application process.

We do not collect or process any special categories of personal data, such as public unique identifiers or sensitive personal data.

**How long do we keep your personal data?**

We store personal data for as long as we find it necessary to fulfil the purpose for which the personal data was collected, while also considering our need to answer your queries or resolve possible problems, to comply with legal requirements under applicable laws, to attend to any legal claims/complaints, and for safeguarding purposes.

This means that we may retain your personal data for a reasonable period of time after your last interaction with us. When the personal data that we have collected is no longer required, we will delete it in a secure manner. We may process data for statistical purposes, but in such cases, data will be anonymised.

**Your rights to your personal data**

You have the following rights with respect to your personal data:

* The right to request a copy of your personal data that we hold about you.
* The right to request that we correct your personal data if inaccurate or out of date.
* The right to request that your personal data is deleted when it is no longer necessary for us to retain such data.
* The right to withdraw any consent to personal data processing at any time. For example, your consent to receive e-marketing communications:
	+ If you want to withdraw your consent to e-marketing, please make use of the link to manage your subscriptions included in our communication.
* The right to request that we provide you with your personal data and, if possible, to pass on this information directly (in a portable format) to another data controller when the processing is based on consent or contract.
* The right to request a restriction on further data processing, in case there is a dispute in relation to the accuracy or processing of your personal data.
* The right to object to the processing of personal data, in case data processing has been based on legitimate interest and/or direct marketing.

Any query about your Privacy Rights should be sent to normski@normwilkinson.com

**The use of cookies**

We may use cookies to collect information as you navigate the company’s websites. Website Navigational Information includes standard information from your web browser, such as browser type and browser language; your Internet Protocol (“IP”) address; and the actions you take on the company’s websites, such as the web pages viewed and the links clicked.

This information is used to make websites work more efficiently, as well as to provide business and marketing information to the owners of the site, and to gather such personal data as browser type and operating system, referring page, path through site, domain of ISP, etc. for the purposes of understanding how visitors use a website. Cookies and similar technologies help us tailor our website to your personal needs, as well as to detect and prevent security threats and abuse. If used alone, cookies do not personally identify you.

If you want to withdraw your acceptance of cookies on our websites, you can go to your web browser and deactivate it.

**Tracking:**To offer a better customer experience to the people visiting our website, we use a number of marketing tools. They allow us to analyse aggregated data, such as visitors’ scrolling patterns or clicks, in order to determine which pages result in the best actions. However, we do not use your personally identifiable information by employing any of these marketing tools. We use Google Analytics as the third-party service provider: [**Privacy Policy**](https://support.google.com/analytics/answer/6004245?hl=en)**.**

**Remarketing:** We may use remarketing tracking cookies and conversion pixels from Google, LinkedIn and Facebook, in order to present you with special offers for our products or services over the Google Content Network and via social networks. This may result in you seeing an ad for one of our products or services after you have visited our website. Moreover, we also create custom audiences based on emails of subscribers and customers, in order to present special offers for our products and services via social media and the Google Content Network. However, we do not use your personally identifiable information by employing any of the remarketing services, other than to present you special offers from us. When using remarketing, some personal data to identify the user, such as name, email and/or phone number, may be transferred to the provider of the advertising or a social media network (such as Facebook).

We use the following third-party service providers for remarketing (see more below under “Use of sub-contractors”):

**Facebook:** [**Opt-out of Facebook remarketing here**](https://www.facebook.com/help/568137493302217)
**Google:** [**Opt-out of Google remarketing here**](https://support.google.com/ads/answer/2662922?hl=en) **LinkedIn:**[**Opt-out of LinkedIn remarketing here**](https://www.linkedin.com/help/linkedin/answer/90274/manage-your-linkedin-ads-settings?lang=en)

More information on how to administer cookies can be found in your browser here: <http://www.aboutcookies.org.uk/managing-cookies>

**Do we share your data with anyone?**

We do not share, sell, rent, or trade your information with any third parties without your consent, except from what is described below:

**Third-party Service Providers working on our behalf:**

We may pass your information on to our distributors, agents, sub-contractors and other associated organizations with the purpose of them providing services to you on our behalf.

**If required by law:**

We will disclose your personal information if required by law or if we, as a company, reasonably believe that disclosure is necessary to protect our company’s rights and/or to comply with a judicial proceeding, court order or legal process. However, we will do what we can to ensure that your privacy rights continue to be protected.

**Changes to this Privacy Statement**

We reserve the right to amend this Privacy Statement at any time. The applicable version will always be found on our websites. We encourage you to check this Privacy Statement occasionally to ensure that you are happy with any changes.

If we make changes that significantly alter our privacy practices, we will notify you by email or post a notice on our websites prior to the change taking effect.

**Your right to complain with a supervisory authority**

If you are unhappy with the way in which your personal data has been processed, you may, in the first instance, contact normski@normwilkinson.com

If you remain dissatisfied, then you have the right to apply directly to your national supervisory authority for a decision. The supervisory authorities can be contacted at:

* **United Kingdom:**Information Commissioner’s Office (ICO)
[ico.org.uk](https://ico.org.uk/)