



Privacy Policy

Blackgate Design (referred to as "Blackgate Design", "we", "us" or "our" in this privacy policy) are committed to protecting and respecting your privacy and is committed to protecting your personal data.

This Policy explains when and why we collect personal information about people, how we use it, the conditions under which we may disclose it to others and how we keep it secure. It also tells you about your privacy rights and how the law protects you.

This Policy will be reviewed and updated from time to time so please check this page occasionally to ensure that you're happy with any changes. By using our website, contacting us or working with us you're agreeing to be bound by this Policy.

This policy was last updated on: 22/05/2018.

Any questions regarding this Policy and our privacy practices should be sent by email to info@blackgate-design.co.uk.

Who are we?

Blackgate Design is a Bristol based Graphic Design company, providing full graphic design services to businesses. As we offer only B2B services, we will only collect a limited amount of personal data and will ask you to provide personal information only where it is necessary for the purposes of our services or for a legitimate business reason, such as improving our services and developing our business.

Blackgate Design is the data controller and responsible for your personal data. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below:

Contact details

Our registered address is Blackgate Design, 3 Ansteys Road, Hanham, Bristol, BS15 3DX.

Our email address is info@blackgate-design.co.uk.

Any communications relating to this policy should be marked for the attention of Greg Dodimead who is responsible for GDPR compliance.

If there is a problem

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

What information is collected?

Personal data, or personal information, 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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Client Data** includes orders made by you or services received by you and any feedback you may have provided.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract 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, to provide you with services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

How and why we collect information

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - request information about our services or ask us to provide a quote;
 - sign up as a client; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- **Third parties.** We may receive limited personal data about you from third parties, as set out below:
 - Technical Data from e.g. analytics providers such as Google based outside the EEA.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
 - Identity and Contact Data from our partners if they have referred you to us as a client.

Legal basis for collecting your information

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:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (but only as long as your interests and fundamental rights do not override those interests).
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data.

We do not currently send direct marketing communications to our clients or prospective clients but if we do so in the future we will always obtain your consent before doing so. You will have the right to withdraw consent to marketing at any time and we will remind you of that right if we do request your consent to direct marketing in the future.

How we use the information

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below:

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you for feedback (including feedback on proposed designs as well as feedback on the completed designs)	(a) Identity (b) Contact (c) Client (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

How long will you use my personal data for?

We hold your personal information on a secure CRM system (customer relationship management system). We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. 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 requirements. We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations. Details of retention periods for different aspects of your personal data are available from us by **contacting us**.

Who has access to your information?

We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes.

Third Party Service Providers working on our behalf: We may pass your information to our preferred suppliers for the purposes of completing tasks and providing services to you on our behalf (for example to provide print, production of items designed by us for you). We will always check with you that you are happy

for us to pass your information to the suppliers before doing so.

When we use third party service providers, we disclose only the personal information that is necessary to enable them to deliver their services for you (usually limited to Identity and Contact Data).

Please be reassured that we will not release your information to third parties beyond Blackgate Design for them to use for their own direct marketing purposes.

Third Party Product Providers we work in association with: We work closely with various third-party product providers to bring you a range of quality and reliable products and services designed to meet the needs of our customers. We may pass your information to our preferred suppliers for the purposes of completing tasks and providing services to you on our behalf (for example to provide print, production of items designed by us for you). We will always check with you that you are happy for us to pass your information to the suppliers before doing so and we will disclose only the personal information that is necessary to enable them to deliver their services for you (usually limited to Identity and Contact Data).

When you enquire about or purchase one or more of these products/services directly from the third party, they will be responsible for your data either as the data controller or a joint controller and therefore we advise you to read their Privacy Policy. These third-party product providers may share your information with us which we will use in accordance with this Privacy Policy.

Other circumstances where we may need to disclose your information to third parties:

- Service providers acting as processors based within the EEA or the US who provide IT, CRM and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, accountants and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- 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 notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers

Some of our service providers (such as our IT and CRM system providers) are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Most of our service providers are based in the US which is covered by the EU-US Privacy Shield. Where we use US-based service providers, we will transfer data to them only if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see: [European Commission: EU-US Privacy Shield](#).
- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: [Adequacy of the protection of personal data in non-EU countries](#).
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: [Model contracts for the transfer of personal data to third countries](#).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Your choices

We will not use your personal information for marketing purposes by email, phone or text message. We will also not contact you for marketing purposes by post. If this was to change, however, you would have certain legal rights to make choices about how we contact you and you would have a right to object to processing.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. In particular, you have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data.

However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

How you can access and update your information

The accuracy of your information is important to us. If you change email address, or any of the other information we hold is inaccurate or out of date, please email us at info@blackgate-design.co.uk, or you can telephone: 07809455667

You have the right to ask for a copy of the information we hold about you.

Security precautions in place to protect the loss, misuse or alteration of your information

When you give us personal information, we take steps to ensure that it's treated securely.

Non-sensitive personal details (your email address etc.) are encrypted when transmitted over the Internet when using systems within our control (e.g. our website and our other hosted services like exchange email).

However, if you submit information to us using a system outside our control (e.g. your personal email account) we cannot guarantee it to be 100% secure whilst in transit to us as it may be transmitted unencrypted across the internet.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Use of 'cookies'

Like many other websites, Blackgate Design website/s use cookies. This helps us to improve our website and deliver a better and more personalised service.

It is possible to switch off cookies by setting your browser preferences. Turning cookies off may result in a loss of functionality when using our website.

Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

16 or Under

We do not knowingly hold or collect any data relating to those 16 and under and ask that you do not submit any personal information to us if you fall into this category. If, however you do send us personal information and are aged 16 or under, please get your parent/guardian's permission beforehand.

Policy Review

We keep this Policy under regular review. This Policy was last updated in May 2018.