

Privacy policy

1. Introduction

- 1.1 I am committed to safeguarding the privacy of my website visitors and individual customers.
- 1.2 This policy applies where I am acting as a data controller with respect to the personal data of such persons; in other words, I determine the purposes and means of the processing of that personal data.
- 1.3 In this policy, "I" refer to *Dmitrijs Martinovs*.

2. Credit

- 2.1 This document was created using a template from Docular (<https://seqlegal.com/free-legal-documents/privacy-policy>).

3. The personal data that I collect

- 3.1 In this Section 3 I have set out the general categories of personal data that I process information about the source and specific categories of that data.
- 3.2 I may process data enabling me to get in touch with you ("**contact data**"). The contact data may include your name and email address. The source of the contact data is you.

4. Purposes of processing and legal bases

- 4.1 In this Section 4, I have set out the purposes for which I may process personal data and the legal bases of the processing.
- 4.2 **Operations** - I may process your personal data for the purposes of providing my services. The legal basis for this processing is my legitimate interest, namely the proper administration of my services.
- 4.3 **Relationships and communications** - I may process your email and name for the purposes of managing our relationships, communicating with you (excluding communicating for the purposes of direct marketing) by email and providing support services. The legal basis for this processing is my legitimate interests, namely communications with my website visitors, service users, and individual customers the maintenance of relationships, and the proper administration of my website and services.
- 4.4 **Record keeping** - I may process your email and name for the purposes of creating and maintaining my database, back-up copies of my database and my business records generally. The legal basis for this processing is my legitimate interests, namely ensuring that I have access to all the information I need to properly and efficiently run my business in accordance with this policy.

5. Providing your personal data to others

- 5.1 I will not disclose your email or/and name to anyone.

- 5.2 Your email address and your name will be stored on the servers of my hosting service provider <https://www.heroku.com/>.
- 5.3 In addition to the specific disclosures of personal data set out in this Section 5, I may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which I am subject, or in order to protect your vital interests or the vital interests of another natural person. I may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

6. International transfers of your personal data

- 6.1 In this Section 6, I provide information about the circumstances in which your personal data may be transferred to countries outside the United Kingdom.
- 6.2 The hosting facilities for our website are situated in the United Kingdom. The competent data protection authorities have made an "adequacy decision" with respect to the data protection laws of this country. For more information on how Heroku hosting provider handles the data security please visit: <https://www.heroku.com/policy/security> . I will not transfer your personal data outside the United Kingdom.

7. Retaining and deleting personal data

- 7.1 This Section 7 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 7.2 Personal data that I process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 7.3 We will retain your personal data as follows:
- (a) contact data will be retained for a minimum period of *3 months* following the date of the most recent contact between you and us, and for a maximum period of *1 year* following that date;
 - (b) communication data will be retained for a minimum period of *3 months* following the date of the communication in question, and for a maximum period of *1 year* following that date;
- 7.4 Notwithstanding the other provisions of this Section 7, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

8. Your rights

- 8.1 In this Section 8, we have listed the rights that you have under data protection law.
- 8.2 Your principal rights under data protection law are:

- (a) **the right to access** - you can ask for copies of your personal data;
- (b) **the right to rectification** - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
- (c) **the right to erasure** - you can ask us to erase your personal data;
- (d) **the right to restrict processing** - you can ask us to restrict the processing of your personal data;
- (e) **the right to object to processing** - you can object to the processing of your personal data;
- (f) **the right to data portability** - you can ask that we transfer your personal data to another organisation or to you;
- (g) **the right to complain to a supervisory authority** - you can complain about our processing of your personal data; and
- (h) **the right to withdraw consent** - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

9. Amendments

- 9.1 I may update this policy from time to time by publishing a new version on my website.
- 9.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 9.3 I may notify you of changes to this policy by email.

10. Our details

- 10.1 This website is owned and operated by *Dmitrijs Martinovs*.
- 10.2 My principal place of business is at *4 Dursley Close, SE3 8PE, London*.
- 10.3 You can contact me:
 - (a) using my website contact form;
 - (b) by telephone, on the contact number published on my website; or
 - (c) by email, using the email address published on my website.