
PRIVACY POLICY

BACKGROUND:

Eureka! Midge Repellent understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, www.bitefree.co.uk (“Our Site”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is requested upon checkout when you purchase goods, alongside Our Terms of Sale.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Account”	means an account required to access and/or use certain areas and features of Our Site;
“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by OurSite are set out in Part 14, below.

2. Information About Us

Our Site is owned and operated by Jane Hallett of Eureka! Midge Repellent, a sole trader.

Data Protection Officer: Jane Hallett.

Email address: jane@janehallett.com

Telephone number: 01852 500 577.

Postal address: Tigh Na Darroch, Ardfern, Argyll, PA31 8QN.

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

4. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers,

electronic location data, and other online identifiers.

5. **What Are My Rights?**

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact Us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask Us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

We would welcome the opportunity to resolve your concerns ourselves however, so please contact us first, using the details in Part 15.

6. **What Data Do You Collect and How?**

Depending upon your use of Our Site, we may collect and hold some or all of the personal and non-personal data set out below, using the methods also set out. Please also see Part 14 for more information about our use of Cookies and similar technologies and our [Cookie Policy](#).

In circumstances where you agree to enter into a contract or agreement with us in order for us to provide you with a product or service, then we may need to collect and use your personal information in order to carry out that agreement or contract. For instance, to fulfil your order of goods from our website and deliver those goods to you.

We do not collect any 'special category' or 'sensitive' personal data or personal data relating to children or data relating to criminal convictions and/or offences.

Please note that in the interest of our customers' safety and security, we have opted to use a third party payment processor (PayPal) for all online orders, meaning we do not collect or use any payment details.

Data Collected	How We Collect the Data
Identity Information including your full name.	Via Our Online Shop Checkout Form.
Contact information including email address, postal address and telephone number (optional).	Via Our Online Shop Checkout Form.
Business information including business name (optional).	Via Our Online Shop Checkout Form.

7. **How Do You Use My Personal Data?**

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Accepting your order on Our Site and fulfilling that order.	Name	Performance of a Contract.
Accepting your order on Our Site and fulfilling that order.	Email Address.	Performance of a Contract.
Accepting your order on Our Site and fulfilling that order.	Postal Address.	Performance of a Contract.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 15.

8. **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept only until the order is fulfilled and complete, though stored on third party servers as per section 9.

9. **How and Where Do You Store or Transfer My Personal Data?**

We store or transfer some of your personal data within the UK. This means that it will be fully protected under the Data Protection Legislation.

We will store or transfer some of your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law.

Customer data is collected and stored via our online shop and website which is hosted and stored on web and email servers provided by One.com (<https://www.one.com/static/info/data-processing-agreement-en.pdf>).

10. **Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions:

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

11. **How Can I Control My Personal Data?**

1. In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Site, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data and do not engage in any email marketing activity.
2. You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

12. **Can I Withhold Information?**

You may access Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data. For instance, to purchase goods in our online shop.

You may restrict our use of Cookies. For more information, see our [Cookie Policy](#).

13. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15.

There is not normally any charge for a subject access request. If your request is

'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 28 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

14. **How Do You Use Cookies?**

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

All Cookies used by and on Our Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.

Please see our [Cookie Policy](#) for full details.

15. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Jane Hallett):

Email address: jane@janehallett.com

Telephone number: 01852 500 577.

Postal Address: Tigh Na Darroch, Ardfern, Argyll, PA31 8QN.

16. **Changes to this Privacy Policy**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 26/06/2020.