

# Privacy Policy

HEATHER FREW (the “Company”) is committed to maintaining robust privacy protections for its users. Our Privacy Policy (“Privacy Policy”) is designed to help you understand how we collect, use and safeguard the information you provide to us and to assist you in making informed decisions when using our Service.

For purposes of this Agreement, “Site” refers to the Company’s website, which can be accessed at [www.heatherfrew.com](http://www.heatherfrew.com).

“Service” refers to the Company’s services accessed via the Site, in which users can engage my virtual assistant services, writing services, social media services, food styling and photography related services.

The terms “we,” “us,” and “our” refer to the Company.

“You” refers to you, as a user of our Site or our Service.

By accessing our Site or our Service, you accept our Privacy Policy and Terms of Use, and you consent to our collection, storage, use and disclosure of your Personal Information as described in this Privacy Policy.

## INFORMATION WE COLLECT

HEATHER FREW collects “Non-Personal Information” and “Personal Information” in the categories described below.

### *Usage data*

HEATHER FREW will process information about your use of our website and services (“usage data”). The usage data may include

- (1) the browser types and versions used
- (2) the operating system used by the accessing system
- (3) the website from which an accessing system reaches our website (so-called referrers)
- (4) the sub-websites
- (5) the date and time (so-called timestamp) of access to the Internet site
- (6) an Internet protocol address (IP address)
- (7) the Internet service provider (ISP) of the accessing system
- (8) the geographical location of the user
- (9) the page views and site navigation paths
- (10) the pattern of the users’ use of the service with regards to timing and frequency
- (11) any other similar data and information that may be used in the event of attacks on our information technology systems.

The source of the usage data is Google Analytics. The usage data collected is needed to

- (1) deliver the content of our website correctly
- (2) optimise the content of our website as well as any advertisement
- (3) ensure the long-term viability of our information technology systems and website technology
- (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack.

In order to process this information, we have obtained the user's consent and our legitimate interests in monitoring and improving our website and services.

#### *Notification data*

HEATHER FREW may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("notification data"). Our newsletter may only be received by the user if

- (1) the user has a valid email address and
- (2) the user registers for the newsletter shipping.

A confirmation email will be sent to the email address registered by a user for the first time for newsletter shipping, for legal reasons, in a double opt-in procedure. The confirmation email is used to prove whether the owner of the email address as the user is authorised to receive the newsletter.

When the user registers for the newsletter, we also store the IP address of the computer system assigned by the Internet service provider (ISP) and used by the user at the time of the registration, as well as the date and time of the registration. The purpose of the collection of this data is to legally protect HEATHER FREW by ensuring understanding of the possible misuse of the email address of a user at a later date. The personal information collected as part of a registration for the newsletter will only be used to send our newsletter.

The subscription to the newsletter may be terminated by the user at any time. The consent to the storage of personal data, which the user has given prior to the shipping of the newsletter, may be revoked at any time. For the purpose of revoking consent, a corresponding link for unsubscribing is found in each newsletter.

#### *Enquiry data, correspondence data and customer relationship data*

HEATHER FREW may process information contained in any enquiry you submit to us regarding our services and products ("enquiry data"). If a user contacts us via email or via a contact form, the personal information transmitted by the user is automatically stored.

The personal information may include:

- (1) the user's contact information
- (2) the user's name
- (3) the name of the user's employer
- (4) the user's job title or role
- (5) the metadata associated with the communication
- (6) and information contained in communications between the user and HEATHER FREW

Such personal data transmitted on a voluntary basis by a user to HEATHER FREW are stored for the purpose of processing or contacting the user, managing our relationships with customers, keeping records of communication with the user, and promoting our products and services to customers.

#### *Publication data*

HEATHER FREW may process information that the users post for publication on our website or through our services ("publication data"). On our website the users can post information in the following ways:

Blog comments, forum posts.

### *Transaction data*

HEATHER FREW may process information that relates to transactions, including purchases of goods and services, that the user enters into with us and/or through our website ("transaction data"). The transaction data may include:

- (1) the user's contact details
- (2) the user's bank card details
- (3) the transaction details with regards to the purchase

In order to process the transactions on our website we use the following third party payment service providers: PayPal and Wix. The details of how the user's data is processed by Paypal can be found here, <https://www.paypal.com/uk/webapps/mpp/ua/privacy-full> The details of how the user's data is processed by Wix can be found here, <https://www.wix.com/about/privacy>

We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding your payments and dealing with queries relating to your payments and refunds.

## **HOW WE USE AND SHARE INFORMATION**

### *Personal Information*

Except as otherwise stated in this Privacy Policy, we do not sell, trade, rent or otherwise share for marketing purposes your Personal Information with third parties without your consent. We do share Personal Information with vendors who are performing services for the Company, such as the servers for our email communications who are provided access to user's email address for purposes of sending emails from us. Those vendors use your Personal Information only at our direction and in accordance with our Privacy Policy.

In general, the Personal Information you provide to us is used to help us communicate with you. For example, we use Personal Information to contact users in response to questions, solicit feedback from users, provide technical support, and inform users about promotional offers.

### *Non-Personal Information*

In general, we use Non-Personal Information to help us improve the Service and customise the user experience. We also aggregate Non-Personal Information in order to track trends and analyse use patterns on the Site. This Privacy Policy does not limit in any way our use or disclosure of Non-Personal Information and we reserve the right to use and disclose such Non-Personal Information to our partners, advertisers and other third parties at our discretion.

### *Legal purpose of the processing of personal data*

HEATHER FREW may process any of your personal information identified in this privacy policy where necessary for the establishment, exercise or defence of legal claims, both in court proceedings and in an administrative or out-of-court procedure. The legal basis for this processing is the protection and assertion of our legal rights, your legal rights and the legal rights of others.

HEATHER FREW may also process any of your personal information identified in this privacy policy where necessary for the purposes of obtaining or maintaining insurance

coverage, managing risks, fulfilment of tax obligations, or obtaining professional advice. The legal basis for this processing is the proper protection of our business against risks.

### **RETAINING AND DELETING YOUR PERSONAL INFORMATION**

The personal information that we process for any purpose or purposes will not be kept for longer than is necessary for the expressed purpose.

In some instances, it is not possible for us to specify in advance the periods for which your personal information will be stored by us. In such cases, we will determine the period of retention based on the following criteria:

- (a) the period of retention of email addresses, IP addresses and all other personal information stored will be determined based on the needs of the business.

### **YOUR DATA PROTECTION RIGHTS UNDER THE GENERAL DATA PROTECTION REGULATION (GDPR)**

If you are a resident of the EEA, you have the following data protection rights:

- If you wish to access, correct, update, or request deletion of your personal information, you can do so at any time by emailing [hello@heatherfrew.com](mailto:hello@heatherfrew.com)
- In addition, you can object to the processing of your personal information, ask us to restrict the processing of your personal information or request portability of your personal information.
- You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing emails we send you. To opt-out of other forms of marketing, please contact us by emailing [hello@heatherfrew.com](mailto:hello@heatherfrew.com)
- Similarly, if we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

### **LINKS TO OTHER WEBSITES**

As part of the Service, we may provide links to or compatibility with other websites or applications. However, we are not responsible for the privacy practices employed by those websites or the information or content they contain. This Privacy Policy applies solely to information collected by us through the Site and the Service. Therefore, this Privacy Policy does not apply to your use of a third party website accessed by selecting a link on our Site or via our Service. To the extent that you access or use the Service through or on another website or application, then the privacy policy of that other website or application will apply to your access or use of that site or application. We encourage our users to read the privacy statements of other websites before proceeding to use them.

## **UPDATES**

We may update this policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you are happy with any changes to this policy. We may notify you of significant changes to this policy by email or by placing a prominent notice on our site.

Significant changes will go into effect 30 days following such notification. Non-material changes or clarifications will take effect immediately. You should periodically check the Site and this privacy page for updates.

## **CONTACT US**

This website is owned and operated by HEATHER FREW. We are registered in the UK as a sole trader.

If you have any questions regarding this Privacy Policy or the practices of this Site, please contact us by sending an email to [hello@heatherfrew.com](mailto:hello@heatherfrew.com)

Last Updated: This Privacy Policy was last updated on 21 January 2020