



TWENTYWELL PRESS

Privacy Policy

This Privacy Policy applies between You, the user of the Website, and Bethany K. Smith trading as Twentywell Press (hereinafter “**Twentywell Press**”), the owner and provider of the Website. Twentywell Press takes the privacy of Your information very seriously. This Privacy Policy applies to Twentywell Press’s use of any and all Personal Data collected by Twentywell Press or provided by You in relation to Your use of the Website.

Please read this Privacy Policy carefully.

1. Definitions and Interpretation

- 1.1. “**Cookies**” shall mean the small text files placed on your computer when You visit certain parts of the Website and/or when You use certain features of the Website;
- 1.2. “**Data Controller**” shall have the meaning ascribed to it in the applicable Data Protection Laws;
- 1.3. “**Data Processor**” shall have the meaning ascribed to it in the applicable Data Protection Laws;
- 1.4. “**Data Protection Laws**” shall mean any law relating to the processing of Personal Data, including but not limited to the UK General Data Protection Regulation (hereinafter “**GDPR**”) and any national implementing and supplementary laws, regulations and secondary legislation;
- 1.5. “**Personal Data**” shall have the meaning ascribed to it in the applicable Data Protection Laws;
- 1.6. “**UK and EU Cookie Law**” shall mean the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011 & the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2018;

- 1.7. “**You**” and “**Your**” shall mean any third party that accesses the Website and is not either (i) employed by Twentywell Press and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to Twentywell Press and accessing the Website in connection with the provision of such services;
- 1.8. “**Website**” shall mean **www.twentywellpress.com** and any subdomains of such site unless expressly excluded by their own terms and conditions.

2. Background

For purposes of this Privacy Policy, unless the context requires a different interpretation:

- 2.1. The singular shall include the plural and vice versa;
- 2.2. References to subclauses, clauses, schedules and appendices are to subclauses, clauses, schedules and appendices of this Privacy Policy unless otherwise specified;
- 2.3. References to “person” shall include natural persons and legal persons such as firms, companies, government entities, organisations, trusts and partnerships;
- 2.4. The term “including” shall mean “including but not limited to”;
- 2.5. Reference to any statutory or regulatory provision shall include any and all modifications and amendments to it;
- 2.6. The headings and subheadings to this Privacy Policy shall not form part of this Privacy Policy.

3. Scope

- 3.1. This Privacy Policy applies only to the actions of Twentywell Press and the Users of the Website. It does not apply to websites owned and controlled by third parties, including websites that can be accessed through links provided on the Website. You are advised to read the privacy policies and/or statements of other websites prior to using them.
- 3.2. For purposes of the applicable Data Protection Laws, Twentywell Press is the Data Controller and the Data Processor. Twentywell Press shall determine the purposes for which and the manner in which Your Personal Data is processed and shall collect and process such Personal Data.

4. Personal Data Collected

- 4.1. Twentywell Press may collect the following Personal Data from You:

- 4.1.1. Name;
 - 4.1.2. Date of birth;
 - 4.1.3. Contact information such as email addresses and telephone numbers;
 - 4.1.4. Mailing address;
 - 4.1.5. Financial information such as debit and/or credit card numbers;
- in each case, in accordance with this Privacy Policy.

5. Manner of Collection

5.1. Twentywell Press collects Personal Data in the following ways:

5.1.1. Personal Data is given to us by You, such as:

5.1.1.1. When You contact Twentywell Press through the Website, or by telephone, post, email or any other means;

5.1.1.2. When You register with Twentywell Press and set up an account to receive Twentywell Press products and/or services;

5.1.1.3. When You enter a competition or promotion through the Website or a social media channel;

5.1.1.4. When You make payments to Twentywell Press, through the Website or otherwise;

5.1.1.5. When You elect to receive marketing communications from us;

in each case, in accordance with this Privacy Policy.

5.1.2. Personal Data is collected automatically. Twentywell Press automatically collects some information about Your visit to the Website. This information is collected to help make improvements to the Website content and navigation, and shall include:

5.1.2.1. Your IP address;

5.1.2.2. The date, times and frequency of Your access to the Website; and

5.1.2.3. The way You use and interact with the content of the Website.

6. Cookies

6.1. The Website may place and access certain Cookies on your computer. Twentywell Press uses Cookies to improve Your experience of using the Website and to improve our range of products. Twentywell Press has

carefully chosen these Cookies and has taken steps to ensure that Your privacy is protected and respected at all times.

6.2. All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.

6.3. Before the Website places Cookies on Your computer You will be presented with the message bar requesting Your consent to set those Cookies. By giving Your consent You are enabling Twentywell Press to provide a better experience and service to You. You may, if You wish, deny consent to the placing of certain Cookies, but if You do so then certain features of the Website may not function fully or as intended.

6.4. The Website may place the following Cookies:

Type of Cookie	Purpose
Strictly necessary cookies	These cookies are required for the operation of the Website, including cookies that enable You to log into secure areas, use a shopping cart or use e-billing services.
Analytical/performance cookies	These cookies allow Twentywell Press to recognise and count the number of visitors to the Website and see how visitors move around the Website when using it, which allows us to improve how the Website works by, for example, ensuring that users are finding what they are looking for easily.
Functionality cookies	These cookies are used to recognise You when You return to the Website, which enables Twentywell Press to personalise content for You, greet You by name and remember Your preferences such as Your choice of language or region.
Targeting cookies	These cookies record Your visit to the Website, the pages You have visited and the links You have followed, which will be used to make the Website and advertising displayed on it more relevant to Your interests. Twentywell Press may also share this information with third parties for this purpose.

6.5. You can find a list of the Cookies Twentywell Press uses in the Twentywell Press Cookies Schedule.

6.6. You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed.

6.7. You can choose to delete Cookies at any time, but You may lose information that enables You to access the Website quicker and more efficiently, including, for example, personalisation settings.

6.8. Twentywell Press recommends that You ensure Your internet browser is up to date and that You consult the help and guidance provided by the developer of Your internet browser if You are unsure about adjusting Your privacy settings.

6.9. For further information on Cookies generally, the following links may be helpful:

6.9.1. Cookies settings in Firefox: **[http://support.mozilla.com/en-US/kb/Enabling and disabling cookies](http://support.mozilla.com/en-US/kb/Enabling_and_disabling_cookies)**

6.9.2. Cookies settings in Internet Explorer:
<https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>

6.9.3. Cookies settings in Google Chrome:
<http://www.google.com/support/chrome/bin/answer.py?answer=95647>

6.9.4. Cookies settings in Safari (OS X):
http://support.apple.com/kb/PH17191?viewlocale=en_US&locale=en_US

6.9.5. Cookies settings in Safari (iOS): **<https://support.apple.com/en-us/HT201265>**

6.9.6. Cookies settings in Android:
<https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DAndroid&hl=en&oco=0>

7. Processing of Personal Data

7.1. Any or all of the Personal Data collected as described above may be used by Twentywell Press from time to time in order to provide You with the best possible service and experience when using the Website. This may include:

7.1.1. Internal record keeping;

7.1.2. Improvement of Twentywell Press products and/or services;

7.1.3. Transmission by email of marketing materials that may be of interest to You;

7.1.4. Contact for research purposes, which may be done using email, telephone, fax or mail, which information may be used to update or customise the Website;

in each case, in accordance with this Privacy Policy.

7.2. Twentywell Press may use Your Personal Data for the purposes set out in Clause 7.1 above if it is deemed necessary for the legitimate interests of Twentywell Press. If You are not satisfied with the use of Your Personal Data in this way, You have the right to object under certain circumstances, as set out in Clause 11 below.

7.3. For the delivery of direct marketing to You via email, Twentywell Press shall require Your consent, whether by opt-in or soft-opt-in, as follows:

7.3.1. A soft-opt-in consent applies when You have previously engaged with Twentywell Press (for example, You have contacted Twentywell Press in the past to ask for more details about a particular product/service and Twentywell Press is now marketing similar products/services). In such circumstances Twentywell Press shall take Your consent as given unless You opt out.

7.3.2. For other types of e-marketing, Twentywell Press shall require Your express consent, meaning You need to take an affirmative step to give consent by, for example, checking a tick-box that Twentywell Press provides.

7.3.3. If You are not satisfied with Twentywell Press's approach to marketing, You have the right to withdraw Your consent at any time. To find out how to withdraw Your consent, see Clause 11 below.

7.4. When You register with Twentywell Press and set up an account to receive Twentywell Press services, the legal basis for the collection and processing of Your Personal Data is the performance of a contract between You and Twentywell Press and/or taking steps, at Your request, to enter into such a contract.

8. Sharing of Personal Data

8.1. Twentywell Press may share Your Personal Data with the following persons:

8.1.1. Third party service providers who provide services to Twentywell Press which require the processing of Personal Data;

8.1.1.1. The purpose is to help third party service providers in receipt of any shared Personal Data to perform functions on Twentywell Press's behalf to ensure the Website runs smoothly and to perform marketing, sales, inventory and accounts analysis.

8.1.2. Third party payment providers who process payments made over the Website;

8.1.2.1. The purpose is to enable third party payment providers to process user payments, refunds, exchanges, credits, discounts and promotions.

in each case, in accordance with this Privacy Policy.

9. Security of Personal Data

9.1. Twentywell Press shall use technical and organisation measures to safeguard Your Personal Data, including the following:

9.1.1. Access to Your account is controlled by a username and password combination that is unique to You;

9.1.2. Twentywell Press stores Your Personal Data on secure servers;

9.1.3. Payment details are encrypted using SSL technology.

9.2. Technical and organisational measures include measures to handle any suspected data breach. If You suspect any misuse or loss of, or unauthorised access to, Your Personal Data, please let Twentywell Press know immediately by contacting **bethany.k.smith@twentywellpress.com**.

9.3. If You would like to request detailed information from Get Safe Online on how to protect Your information, computers and devices against fraud, identity theft, viruses and other online issues, please visit **www.getsafeonline.org**.

10. Personal Data Retention

10.1. Unless a longer period is required or permitted by law, Twentywell Press shall only hold Your data for the period necessary to fulfil the purposes outlined in this Privacy Policy or until You request that Your Personal Data be deleted.

10.2. Once Your Personal Data has been deleted by Twentywell Press it may persist on backup or archival media for legal, tax or regulatory purposes.

11. Your Rights

11.1. In connection with the collection and processing of Your Personal Data, You have the following rights:

11.1.1.1. **Right to access**, which includes the right to request:

11.1.1.1.1. Copies of the Personal Data Twentywell Press holds about You at any time; and/or

11.1.1.1.2. Modifications, updates and/or deletions of such Personal Data.

If Twentywell Press provides You with access to the Personal Data held about You, You will not be charged for this unless Your request is manifestly unfounded or excessive. Where legally permitted to do so Twentywell Press may refuse Your request, and if Your request is refused You will be told the reasons why.

- 11.1.1.2. **Right to correct**, which is the right to have Your Personal Data rectified or altered if it is inaccurate or incomplete.
 - 11.1.1.3. **Right to erase**, which is the right to request that Twentywell Press delete or remove Your Personal Data from the Twentywell Press systems.
 - 11.1.1.4. **Right to restrict the use of Your Personal Data**, which is the right to block Twentywell Press from using Your Personal Data or to limit the way in which Your Personal Data can be used.
 - 11.1.1.5. **Right to data portability**, which is the right to request that Twentywell Press moves, copies or transfers Your Personal Data.
 - 11.1.1.6. **Right to object**, which is the right to object to Twentywell Press's use of Your Personal Data including where it is used for Twentywell Press's legitimate interests.
- 11.2. To make enquiries, exercise any of Your rights set out above, or withdraw Your consent to the processing of Your Personal Data (where consent is the legal basis for processing Your Personal Data), please contact **bethany.k.smith@twentywellpress.com**.
- 11.3. If You are not satisfied with the way a complaint You make in relation to Your Personal Data is handled by Twentywell Press, You may be able to refer Your complaint to the relevant data protection authority. For the UK this is the Information Commissioner's Office (ICO). Contact details for the ICO can be found on their website **www.ico.org.uk**.
- 11.4. It is important that the Personal Data Twentywell Press holds about You is accurate and current. Please keep Twentywell Press informed if Your Personal Data changes during the period for which it is held.

12. Changes of Business Ownership and Control

- 12.1. Twentywell Press may from time to time expand or reduce business operations and this may involve the sale and/or transfer of control of all or part of Twentywell Press. Personal Data provided by You will, where it is relevant to any part of the business so transferred, be transferred along with that part of the business and the new owner and/or newly controlling party shall, under the terms of this Privacy Policy, be permitted to use the Personal Data for the purposes for which it was originally supplied to Twentywell Press.
- 12.2. Twentywell Press may also disclose Personal Data to a prospective purchaser of the business and/or any part of it.
- 12.3. In relation to Clauses 12.1 and 12.2 above, Twentywell Press shall take steps with the goal of ensuring Your privacy is protected.

13. General

- 13.1. You may not transfer any of Your rights under this Privacy Policy to any other person. Twentywell Press may transfer our rights under this Privacy Policy where we reasonably believe Your rights will not be affected.
- 13.2. If any court or competent authority finds that any provision (or part of any provision) of this Privacy Policy is invalid, illegal or unenforceable, that provision (or part of it) shall, to the extent required, be deemed deleted and the validity and enforceability of the remaining provisions of this Privacy Policy shall not be affected.
- 13.3. Unless otherwise agreed, no delay, act or omission by any party in exercising any right or remedy in connection with this Privacy Policy shall be deemed a waiver of that or any right or remedy.
- 13.4. This Privacy Policy shall be governed by and interpreted in accordance with the laws of England and Wales, and any and all disputes arising under this Privacy Policy shall be subject to the exclusive jurisdiction of the courts of England and Wales.

14. Changes to this Privacy Policy

- 14.1. Twentywell Press reserves the right to change this Privacy Policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and You are deemed to have accepted the terms of the Privacy Policy on Your first use of the Website following the changes.

You may contact Twentywell Press by email at
bethany.k.smith@twentywellpress.com

This Privacy Policy was created by Twentywell Press on **10th June 2021**.