



Privacy Policy

Introduction

Welcome to Sobriety Rays privacy policy.

I respect your privacy and are committed to protecting your personal data. This privacy policy will inform you about how I look after your personal data when you visit my website, social media accounts or our online communities (regardless of where you visit them from) and tell you about your privacy rights and how the law protects you. When I refer to 'website' in this policy the term will be deemed to include all of our social media accounts and online communities from time to time including Facebook groups.

It contains important information on who I am and how and why I collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact me or supervisory authorities in the event you have a complaint.

I collect, use and are responsible for certain personal information about you. When I do so we are subject to data protection laws which apply across the European Union and the United Kingdom and I am responsible as 'controller' of that personal information for the purposes of those laws.

By providing me with your data, you warrant to me that you are over 13 years of age.

1. Important information and who I am

Purpose of this privacy policy

This privacy policy aims to give you information on how I collect and process your personal data through your use of our website, including any data you may provide through this website when you fill in my contact form, sign up for freebies, sign up to receive information from me or take part in a competition.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or notice or fair processing notice I may provide on specific occasions when I am collecting or processing personal data about you so that you are fully aware

of how and why I am using your data. This privacy policy supplements the other policies and notices and is not intended to override them.

Controller

Donna Espin-Smith is the controller and responsible for your personal data (collectively referred to “I”, “me” or “my” in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact me using the details set out below.

Contact details

If you have any questions about this privacy policy or my privacy practices, please contact me. My details are:

Donna Espin-Smith

donnasobrietyrays@gmail.com

donnasmith20@hotmail.co.uk

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). However, I care deeply about your data protection rights and I would appreciate the chance to deal with your concerns before you approach the ICO so please contact me using the details above in the first instance.

Your duty to inform us of changes

It is important that the personal data I hold about you is accurate and current. Please keep me informed if your personal data changes during your relationship with me.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. I do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy or notice of every website you visit.

2. The data we collect about you

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).

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

- **Identity Data** includes first name, last name, username or similar identifier, title, date of birth and gender.
- **Contact Data** includes billing address, delivery or postal 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 products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your log-in data, 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.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

I 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, I may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

Sensitive Data

Sensitive data refers to data that 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, and criminal convictions and offences.

I need to collect the following sensitive data about you in order to deliver my service.

I may require information about your health and wellness.

I require your explicit consent for processing sensitive data, so when you submit your details, I will ask you to confirm your explicit consent to this processing.

3. How is your personal data collected?

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

- **Direct interactions.** You may give me your Identity, Contact and Financial Data by filling in forms or by corresponding with me by post, phone, email or otherwise. This includes personal data you provide when you (where applicable):
 - apply for my products or services;
 - create an account on my website;
 - subscribe to my service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give me some feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, I may automatically collect Technical Data about your equipment, browsing actions and patterns. I collect this personal data by using cookies and other similar technologies. Please see my cookie policy for more details.

- **Analytics** I may receive technical personal data about you from analytics providers such as Google.
- I may receive Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Paypal.

4. How I use your personal data

I will only use your personal data when the law allows us to. Most commonly, I will use your personal data in the following circumstances:

- Where I need to perform the contract I am about to enter into or have entered into with you.
- Where it is necessary for my legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where I need to comply with a legal or regulatory obligation.
- To keep you updated about my products and services where you have consented to this. I shall send this information to you by email.

You have the right to withdraw consent to marketing at any time by contacting me in the details above or by clicking the unsubscribe button in my emails.

Purposes for which we will use your personal data

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

Note that I may process your personal data for more than one lawful ground depending on the specific purpose for which I am using your data.

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 my relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation

(b) Asking you to leave a review or take a survey	(d) Marketing and Communications	(c) Necessary for my legitimate interests (to keep my records updated and to study how customers use my products/services)
To enable you to partake in a competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for my legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect my 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 my legitimate interests (for running my 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 deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for my legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve my website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for my legitimate interests (to define types of customers for our products and services, to keep my website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for my legitimate interests (to develop my products/services and grow my business)

Marketing

I strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. My lawful ground for processing your personal data to send you marketing communications is either your consent or my legitimate interests (namely to grow my business).

Under the Privacy and Electronic Communications Regulations, I may send you marketing communications from me if (i) you made a purchase or asked for information from me about my goods or services or (ii) you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However you can still opt out of receiving marketing emails from me at any time.

Promotional offers from me

I may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what I think you may want or need, or what may be of interest to you. This is how I decide which products, services and offers may be relevant for you (I call this marketing).

You will receive marketing communications from me if you have requested information from me or purchased goods or services from me and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

I do not share your personal data with any third parties.

Opting out

You can ask me to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting my details above at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to me as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see my cookie policy.

Change of purpose

I will only use your personal data for the purposes for which I collected it, unless I reasonably consider that I need to use it for another reason and that reason is compatible with the original purpose.

Please note that I may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

I may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:

- External Third Parties such as service providers, professional advisers, HMRC and regulators; and
- Third parties to whom I may choose to sell, transfer, or merge parts of my business or our assets. Alternatively, I may seek to acquire other businesses or merge with them. If a change happens to my business, then the new owners may use your personal data in the same way as set out in this privacy policy.

I require all third parties to respect the security of your personal data and to treat it in accordance with the law. I 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.

6. International transfers

To deliver services to you, it is sometimes necessary for me to share your personal information outside the European Economic Area (EEA) or the UK eg:

- With our service providers located outside the EEA or the UK
- If you are based outside the EEA or the UK
- Where there is an international dimension to the services I am if you are based outside the EEA and/or the UK

These transfers are subject to special rules under European and UK data protection law.

- Whenever I 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:
- I 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, recognised by the UK government.
- Where I use certain service providers, I may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe, as recognised by the UK government.

If you would like further information please contact me using the contact details above.

7. Data security

I have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, I 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 my instructions and they are subject to a duty of confidentiality.

I 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.

8. Data retention

How long will you use my personal data for?

I will only retain your personal data for as long as necessary to fulfil the purposes I collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. I may retain your personal data for a longer period in the event of a complaint or if I reasonably believe there is a prospect of litigation in respect to my relationship with you.

To determine the appropriate retention period for personal data, I 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 I process your personal data and whether I can achieve those purposes through other means, and the applicable legal requirements.

By law I have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

If you are not a customer I shall retain your data for 2 years following your last engagement with us.

In some circumstances you can ask me to delete your data: see 'Request erasure' below for further information.

In some circumstances I may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case I may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- Request access to your personal data.

- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact me on my contact details above.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, I may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, I may refuse to comply with your request in these circumstances.

Changes to this privacy policy

I may change this privacy policy from time to time – when I do I shall inform you via our website.