



PRIVACY POLICY

BACKGROUND:

Place Over Ears 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 placeoverears.co.uk 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 deemed to occur upon your first use of our website. If you do not accept and agree with this Privacy Policy, you must stop using our website immediately.

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 placeoverears.co.uk ;
“Cookie”	means a small text file placed on your computer or device by our website when you visit certain parts of our website and/or when you use certain features of our website. Details of the Cookies used by our website are set out in Part 14, below; and
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

2. Information About Us

Our website is owned and operated by Place Over Ears Limited a limited company registered in England and Wales.

Main trading address: St Augustine’s Business Centre, 125 Canterbury Road, Westgate on Sea, Kent, CT8 8NL, United Kingdom.

Data Protection Officer: Mr Paul Cherry

Email address: info@placeoverears.co.uk

Telephone number: +44 7732 945144

Postal Address: Place Over Ears Limited St Augustine’s Business Centre, 125 Canterbury Road, Westgate on Sea, Kent, CT8 8NL, United Kingdom.

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of our website. Our website 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”) 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 GDPR, 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 have. 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 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.

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.

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.

6. **What Data Do We Collect?**

Depending upon your use of our website, we may collect some or all of the following personal and non-personal data (please also see Part 14 on our use of Cookies):

- Billing and delivery names;
- Billing and delivery addresses;
- Billing and delivery email address;
- Billing and delivery telephone numbers;

- Place Over Ears customer account password (encrypted);

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

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Supplying our services or products to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products or services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email that you have opted-in to (you may unsubscribe or opt-out at any time by clicking the unsubscribe link that appears on this email).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email or telephone or text message or post with information, news, and offers on our products or services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

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 for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- We keep your records for 10 years after the date of your last visit to our website.

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

Selected data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

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

All relevant information that you provide to us through your use of our website (excluding any payment card and or payment details) is stored on our secure, hosted servers.

As a matter of course, all personally identifiable details that you send to us through our website are processed using Secure Socket Layer (SSL) technology. Where we have

given you (or where you have chosen) a password, which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

All payment transactions and the information that you provide for these is handled and securely processed by Stripe Inc. and their secure payment tokenisation system. By utilising this encrypted, tokenised payment system we do not keep identifiable records of the payment cards you provide us with. More information regarding the manner in which Stripe processes and stores your details can be found at <https://stripe.com/gb/privacy>

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

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 GDPR, set out in Part 5, when you submit personal data via our website, 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 for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails).
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 website without providing any personal data at all. However, to use all features and functions available on our website you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Part 14.

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. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

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 one month 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 website may place and access certain first-party Cookies on your computer or device.

By using our website, you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us. Third-party Cookies are used on our website to analyse our visitors use of our website. For more details, please refer to the table below. These Cookies are not integral to the functioning of our website and your use and experience of our website will not be impaired by refusing consent to them.

All Cookies used by and on our website 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 website may not function fully or as intended should you refuse first-party cookies.

The following third-party Cookies may be placed on your computer or device:



Cookie Name	Description	Type	Sensitivity	Duration	Category
viewed_cookie_policy	The cookie is set by the GDPR Cookie Consent plugin and is used to store whether or not user has consented to the use of cookies. It does not store any personal data.	persistent	necessary	11 months	necessary
cookieLawinfo-checkbox-necessary	This cookie is set by GDPR Cookie Consent plugin. The cookies is used to store the user consent for the cookies in the category "Necessary".	persistent	necessary	11 months	necessary
cookieLawinfo-checkbox-functional	The cookie is set by GDPR cookie consent to record the user consent for the cookies in the category "Functional".	persistent	necessary	11 months	necessary
cookieLawinfo-checkbox-performance	This cookie is set by GDPR Cookie Consent plugin. The cookie is used to store the user consent for the cookies in the category "Performance".	persistent	necessary	11 months	necessary
cookieLawinfo-checkbox-analytics	This cookie is set by GDPR Cookie Consent plugin. The cookie is used to store the user consent for the cookies in the category "Analytics".	persistent	necessary	11 months	necessary
cookieLawinfo-checkbox-others	This cookie is set by GDPR Cookie Consent plugin. The cookie is used to store the user consent for the cookies in the category "Other".	persistent	necessary	11 months	necessary
m	Stripe sets this cookie cookie to process payments.	persistent	non-necessary	2 years	e-commerce
PHPSESSID	This cookie is native to PHP applications. The cookie is used to store and identify a users' unique session ID for the purpose of managing user session on the website. The cookie is a session cookies and is deleted when all the browser windows are closed.	persistent	non-necessary	6 hours	e-commerce
cookieLawinfo-checkbox-advertisement	Set by the GDPR Cookie Consent plugin, this cookie is used to record the user consent for the cookies in the "Advertisement" category .	persistent	non-necessary	1 year	necessary
__stripe_mid	Stripe sets this cookie cookie to process payments.	persistent	necessary	1 year	e-commerce



__stripe_sid	Stripe sets this cookie to process payments.	persistent	necessary	30 minutes	e-commerce
_ga	The _ga cookie, installed by Google Analytics, calculates visitor, session and campaign data and also keeps track of site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitors.	persistent	non-necessary	2 years	analytics
_gid	Installed by Google Analytics, _gid cookie stores information on how visitors use a website, while also creating an analytics report of the website's performance. Some of the data that are collected include the number of visitors, their source, and the pages they visit anonymously.	persistent	non-necessary	1 day	analytics
_gat	This cookie is installed by Google Universal Analytics to restrain request rate and thus limit the collection of data on high traffic sites.	persistent	non-necessary	1 minute	performance
wordpress_logged_in_*	This cookie is native to Wordpress, Place Over Ears' Content Management System. The cookie is used to store and identify a users' unique session ID for the purpose of managing user session on the website. The cookie is temporary and lasts for 48 hours.	session	necessary	1 year	e-commerce
wordpress_sec_*	The length of the period at which Wordpress, Place Over Ears' CMS can store and/or read certain data from your computer by using wordpress_logged_in_* cookie.	session	necessary	1 year	e-commerce
wfawf-authcookie-*	The length of the period at which Wordfence, Place Over Ears' CMS security application can store and/or read certain data from your computer whilst using wordpress_logged_in_* cookie.	persistent	necessary	24 hours	e-commerce

In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

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 Mr Paul Cherry):

Email address: info@placeoverears.co.uk

Telephone number: +44 7732 945144

Postal Address: Place Over Ears Limited, St Augustine's Business Centre, 125 Canterbury Road, Westgate on Sea, Kent, CT8 8NL, United Kingdom.

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 website and you will be deemed to have accepted the terms of the Website Privacy Policy on your first use of our website following the alterations. We recommend that you check this page regularly to keep up-to-date.