

This Privacy Policy sets out how we, Miss Mop Limited, collect, store and use information about you when you use or interact with our website, [www.missmop.net](http://www.missmop.net) (our **website**) and where we otherwise obtain or collect information about you. This Privacy Policy is effective from **8<sup>th</sup> May 2019**.

If you have any questions about our Privacy Policy, please contact us by sending an email to [info@missmop.net](mailto:info@missmop.net)

Information we collect when you visit our website

We collect and use information from website visitors in accordance with this section and the section entitled Disclosure and additional uses of your information.

Web server log information

We use a third party server to host our website. Our website server automatically logs the IP address you use to access our website as well as other information about your visit such as the pages accessed, information requested, the date and time of the request, the source of your access to our website (e.g. the website or URL (link) which referred you to our website), and your browser version and operating system.

Our server is located in the United Kingdom.

#### **Use of website server log information for IT security purposes**

Our third party hosting provider stores server logs to ensure network and IT security and so that the server and website remain uncompromised. This includes analysing log files to help identify and prevent unauthorised access to our network, the distribution of malicious code, denial of services attacks and other cyber attacks, by detecting unusual or suspicious activity.

Unless we are investigating suspicious or potential criminal activity, we do not make, nor do we allow our website server provider to make any attempt to identify you from the information collected via server logs.

**Legal basis for processing:** compliance with a legal obligation to which we are subject (Article 6(1)(c) of the General Data Protection Regulation).

**Legal obligation:** we have a legal obligation to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of our processing of information about individuals. Recording access to our website using server log files is such a measure.

**Legal basis for processing:** our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interests:** we have a legitimate interest in using your information for the purposes of ensuring network and information security.

#### **Cookies**

Cookies are data files which are sent from a website to a browser to record information about users for various purposes.

We use cookies, including essential, functional and analytical cookies. For further information on how we use cookies, please see our [cookies policy](#). You can reject some or all of the cookies we use on or via our website by changing your browser settings, but doing so can impair your ability to use our website or some or all of its features. For further information about cookies, including how to change your

browser settings and other ways in which you can reject cookies, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org) or see our [cookies policy](#).

Information we collect when you contact us

We collect and use information from individuals who contact us in accordance with this section and the section entitled [Disclosure and additional uses of your information](#).

## Email

When you send an email to the email address displayed on our website, we collect your email address and any other information you provide in that email (such as your name, telephone number and the information contained in any signature block in your email).

**Legal basis for processing:** our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

**Legitimate interest(s):** responding to enquiries and messages we receive and keeping records of correspondence.

### **Transfer and storage of your information**

We use a third party email provider to store emails you send us. Our third party email provider is based in the xxx.

Emails you send us will be stored outside the European Economic Area on our third party email provider's servers in the United States of America. For further information and safeguards used, please see the section of this privacy policy entitled [Transfers of your information outside the European Economic Area](#).

## Contact Form

When you contact us using our contact form, we collect the following information: your name, email address and any information you include in the message field. We also collect your company name if you provide it.

If you do not provide the mandatory information required by our contact form, you will not be able to submit the contact form and we will not receive your enquiry.

**Legal basis for processing:** our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

**Legitimate interest(s):** responding to enquiries and messages we receive and keeping records of correspondence.

### **Transfer and storage of your information**

Messages you send us via our contact form will be stored on our web servers in the UK and also transferred to our email provider's servers outside the European Economic Area.

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled [Transfers of your information outside the European Economic Area](#).

## Phone

When you contact us by phone, we collect your phone number and any information provide to us during your conversation with us. We do not record phone calls.

**Legal basis for processing:** our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

**Legitimate interest(s):** responding to enquiries and messages we receive and keeping records of correspondence.

**Transfer and storage of your information**

Information about your call, such as your phone number and the date and time of your call, is processed by our third party telephone service provider and stored in the United Kingdom.

**Post**

If you contact us by post, we will collect any information you provide to us in any postal communications you send us.

**Legal basis for processing:** our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

**Legitimate interest(s):** responding to enquiries and messages we receive and keeping records of correspondence.

**Transfer and storage of your information**

Information you send us by post is stored in the United Kingdom.

**Disclosure and additional uses of your information**

This section sets out the circumstances in which we will disclose information about you to third parties and any additional purposes for which we use your information.

**Disclosure of your information to service providers**

We use a number of third parties to provide us with services which are necessary to run our business or to assist us with running our business and who process your information for us on our behalf. These include the following:

- Email provider
- Self-employed cleaners
- Providers of specialist cleaning services (ovens, carpets)
- IT service providers
- Hosting provider

Our service providers are located in the United Kingdom.

Your information will be shared with these service providers only where necessary to enable us to run our business.

**Disclosure of your information for legal reasons**

**Indicating possible criminal acts or threats to public security to a competent authority**

If we suspect that criminal or potential criminal conduct has been occurred, we will in certain circumstances need to contact an appropriate authority, such as the police. This could be the case, for instance, if we suspect that a fraud or a cyber crime has been

committed or if we receive threats or malicious communications towards us or third parties.

We will generally only need to process your information for this purpose if you were involved or affected by such an incident in some way.

**Legal basis for processing:** our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interests:** preventing crime or suspected criminal activity (such as fraud).

**In connection with the enforcement or potential enforcement of our legal rights**

We will use your information in connection with the enforcement or potential enforcement of our legal rights, including sharing information with debt collection agencies if you do not pay amounts owed to us when you are contractually obliged to do so. Our legal rights may be contractual (where we have entered into a contract with you) or non-contractual (such as legal rights that we have under copyright law or tort law).

**Legal basis for processing:** our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interest:** enforcing our legal rights and taking steps to enforce our legal rights.

**In connection with a legal or potential legal dispute or proceedings**

We may need to use your information if we are involved in a dispute with you or a third party for example, either to resolve the dispute or as part of any mediation, arbitration or court resolution or similar process.

**Legal basis for processing:** our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interest(s):** resolving disputes and potential disputes.

**For ongoing compliance with laws, regulations and other legal requirements**

We will use and process your information in order to comply with legal obligations to which we are subject. For example, we may need to disclose your information pursuant to a court order or subpoena if we receive one or to the National Crime Agency in connection with suspected or potential money laundering matters.

**Legal basis for processing:** compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).

**Legal obligation(s):** legal obligations to disclose information which are part of the laws of England and Wales or if they have been integrated into the United Kingdom's legal framework (for example in the form of an international agreement which the United Kingdom has signed).

**Legal basis for processing:** our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interest:** where the legal obligations are part of the laws of another country and have not been integrated into the United Kingdom's legal framework, we have a legitimate interest in complying with these obligations.

## Disclosure of your information to other third parties

We disclose your information to other third parties in specific circumstances, as set out below.

### Providing information to Google Inc.

Google collects information through our use of Google Analytics on our website. Google uses this information, including IP addresses and information from cookies, for a number

of purposes, such as improving its Google Analytics service. Information is shared with Google on an aggregated and anonymised basis. To find out more about what information Google collects, how it uses this information and how to control the information sent to Google, please see the [partners page](#) of Google's privacy policy

**Legal basis for processing:** our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interest(s):** meeting our contractual obligations to Google under our [Google Analytics Terms of Service](#) and allowing the Google Analytics to work on our website

You can opt out of Google Analytics by installing the browser plugin [here](#)

**Sharing your information with a prospective or actual purchaser or seller in the context of a business or asset sale or acquisition by us, a merger or similar business combination event, whether actual or potential**

**Legal basis for processing:** legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interest(s):** sharing your information with a prospective purchaser, seller or similar person in order to allow such a transaction to take place.

**Sharing your information with third parties, which are either related to or associated with the running of our business, where it is necessary for us to do so. These third parties include our accountants, advisors, affiliates, business partners, independent contractors, and insurers**

Further information on each of these third parties is set out below.

**Legal basis for processing:** our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interest:** running and managing our business efficiently.

#### Accountants

We share information with our accountants for tax purposes. For example, we share invoices we issue and receive with our accountants for the purpose of completing tax returns and our end of year accounts.

Our accountants are located in the United Kingdom.

#### Advisors

Occasionally, we obtain advice from advisors, such as accountants, financial advisors, lawyers and other specialists. We will share your information with these third parties only where it is necessary to enable these third parties to be able to provide us with the relevant advice.

Our advisors are located in the United Kingdom.

#### Affiliates

Affiliates are individuals or entities we work with to promote our business by various means, including by advertising our services on their websites, for example. Our affiliates can be in any industry, sector or sub-sector. Affiliates will share information with us and we will share information with them where you have expressed an interest in our products or services.

Our affiliates are located in the United Kingdom.

#### Business partners

Business partners are businesses we work with which provide goods and services which are complementary to our own or which allow us to provide goods or services which we

could not provide on our own. We share information with our business partners where you have requested services which they provide whether independently from, or in connection with or own services.

Our business partners are located in the United Kingdom.

#### Independent contractors

Occasionally, we use independent contractors in our business. Your information will be shared with independent contractors only where it is necessary for them to perform the function we have hired them perform in relation to our business.

Our independent contractors are located in the United Kingdom.

#### Insurers

We will share your information with our insurers where it is necessary to do so, for example in relation to a claim or potential claim we receive or make or under our general disclosure obligations under our insurance contract with them.

Our insurers are located in the United Kingdom.

#### How long we retain your information

This section sets out how long we retain your information. We have set out specific retention periods where possible. Where that has not been possible, we have set out the criteria we use to determine the retention period.

#### Specific retention periods

**Order information:** when you place an order for services, we retain that information for a minimum period of six years following the end of the financial year in which you placed your order, in accordance with our legal obligation to keep records for tax purposes under paragraph 6, Schedule 11 of the Value Added Tax Act 1994.

**Correspondence and enquiries:** when you make an enquiry or contact us by email or via our contact form, we will retain your information for as long as it takes to respond to and resolve your enquiry, and for 6 further month(s), after which point we will delete your information.

#### Criteria for determining retention periods

In any other circumstances, we will retain your information for no longer than necessary, taking into account the following:

- the purpose(s) and use of your information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future);
- whether we have any legal obligation to continue to process your information (such as any record-keeping obligations imposed by relevant law or regulation);
- whether we have any legal basis to continue to process your information (such as your consent);
- how valuable your information is (both now and in the future);
- any relevant agreed industry practices on how long information should be retained;

- the levels of risk, cost and liability involved with us continuing to hold the information;
- how hard it is to ensure that the information can be kept up to date and accurate; and
- any relevant surrounding circumstances (such as the nature and status of our relationship with you).

How we secure your information

### Measures taken to secure your information

We take appropriate technical and organisational measures to secure your information and to protect it against unauthorised or unlawful use and accidental loss or destruction, including:

- only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
- using secure servers to store your information;
- verifying the identity of any individual who requests access to information prior to granting them access to information; and
- using Secure Sockets Layer (SSL) software or other similar encryption technologies to encrypt any payment transactions you make on or via our website.

### Transmission of information to use via email

Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means), you do so entirely at your own risk.

We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.

### Your rights in relation to your information

#### Your rights

Subject to certain limitations on certain rights, you have the following rights in relation to your information, which you can exercise by writing to Miss Mop Limited or sending an email to [info@missmop.net](mailto:info@missmop.net):

- **to request access to your information** and information related to our use and processing of your information;
- **to request the correction or deletion** of your information;
- **to request that we restrict our use** of your information;
- **to receive information which you have provided to us in a structured, commonly used and machine-readable format** (e.g. a CSV file) and the right to have that information transferred to another data controller (including a third party data controller);
- **to object to the processing of your information for certain purposes** (for further information, see the section below entitled [Your right to object to the processing of your information](#)); and
- **to withdraw your consent to our use of your information** at any time where we rely on your consent to use or process that information. Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of

your information on the basis of your consent before the point in time when you withdraw your consent.

In accordance with Article 77 of the General Data Protection Regulation, you also have the **right to lodge a complaint with a supervisory authority**, in particular in the Member State of your habitual residence, place of work or of an alleged infringement of the General Data Protection Regulation.

For the purposes of the UK, the supervisory authority is the Information Commissioner's Office (ICO).

### Further information about your rights

The above rights are provided in summary form only and certain limitations apply to many of these rights. For further information about your rights in relation to your information, including any limitations which apply, please visit the following pages on the ICO's website:

- [Guide To The General Data Protection Regulation](#)
- [Is My Information Being Handled Correctly](#)

You can also find out further information about your rights, as well as information on any limitations which apply to those rights, by reading the underlying legislation contained in Articles 12 to 22 and 34 of the General Data Protection Regulation

### Verifying your identity when you request access to your information

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so.

These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.

### How we verify your identity

Where we possess appropriate information about you on file, we will attempt to verify your identity using that information.

If it is not possible to identify you from such information, or if we have insufficient information about you, we may require original or certified copies of certain documentation in order to be able to verify your identity before we are able to provide you with access to your information.

We will be able to confirm the precise information we require to verify your identity in your specific circumstances if and when you make such a request.

### Your right to object to the processing of your information

#### Your right to object

You have the following rights in relation to your information, which you may exercise by writing to Miss Mop Limited or sending an email to [info@missmop.net](mailto:info@missmop.net):

- to object to us using or processing your information where we use or process it in order to **carry out a task in the public interest or for our legitimate interests**,



including 'profiling' (i.e. analysing or predicting your behaviour based on your information) based on any of these purposes; and

- to object to us using or processing your information for **direct marketing purposes** (including any profiling we engage in that is related to such direct marketing).

You may also exercise your right to object to us using or processing your information for direct marketing purposes by:

- **clicking the unsubscribe link** contained at the bottom of any marketing email we send to you and following the instructions which appear in your browser following your clicking on that link;
- **sending an email** to [info@missmop.net](mailto:info@missmop.net), asking that we stop sending you marketing communications or by including the words "OPT OUT".

For more information on how to object to our use of information collected from cookies and similar technologies, please see the section entitled How to accept or reject cookies in our [cookies policy](#)

## Sensitive Personal Information

### What is sensitive personal information

'Sensitive personal information' is information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic information, biometric information for the purpose of uniquely identifying an individual, information concerning health or information concerning a natural person's sex life or sexual orientation.

### Our policy on sensitive personal information

We do not knowingly or intentionally collect sensitive personal information from individuals, and you must not submit sensitive personal information to us.

If, however, you inadvertently or intentionally transmit sensitive personal information to us, you will be considered to have explicitly consented to us processing that sensitive personal information under Article 9(2)(a) of the General Data Protection Regulation. We will use and process your sensitive personal information for the purposes of deleting it.

## Changes to our privacy policy

### Minor changes

Where we make minor changes to our Privacy Policy, we will update our Privacy Policy with a new effective date stated at the beginning of it. Our processing of your information will be governed by the practices set out in that new version of the Privacy Policy from its effective date onwards.

### Major changes

Where we make major changes to our Privacy Policy or intend to use your information for a new purpose or a different purpose than the purposes for which we originally collected it, we will notify you by email (where possible) or by posting a notice on our website.

We will provide you with the information about the change in question and the purpose and any other relevant information before we use your information for that new purpose.

Wherever required, we will obtain your prior consent before using your information for a purpose that is different from the purposes for which we originally collected it.

## **Additional information**

### Children's privacy

Because we care about the safety and privacy of children online, we comply with the Children's Online Privacy Protection Act of 1998 (COPPA). COPPA and its accompanying regulations protect the privacy of children using the internet. We do not knowingly contact or collect information from persons under the age of 18. The website is not intended to solicit information of any kind from persons under the age of 18.

It is possible that we could receive information pertaining to persons under the age of 18 by the fraud or deception of a third party. If we are notified of this, as soon as we verify the information, we will, where required by law to do so, immediately obtain the appropriate parental consent to use that information or, if we are unable to obtain such parental consent, we will delete the information from our servers. If you would like to notify us of our receipt of information about persons under the age of 18, please do so by sending an email to [enquiries@gdprprivacypolicy.org](mailto:enquiries@gdprprivacypolicy.org)

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