



Data Privacy Notice

Highlights:

- We are TiffCo Limited, registered in England and Wales with registered number 11306217 and registered office at 298 Hyde End Road, Spencers Wood, Reading RG7 1DN. TiffCo Limited's VAT number is 294299256.
- Our Data Protection Lead can be contacted at tiffany@tiffanykemp.com.
- we have produced this privacy notice in order to keep you informed of how we handle your personal data and to let you know that all handling of your personal data is done in compliance with the General Data Protection Regulation (EU) 2016/679 and the Data Protection Act 2018 ("Data Protection Legislation").
- The terms "Personal Data", "Special Categories of Personal Data", "Personal Data Breach", "Data Protection Officer", "Data Controller", "Data Processor", "Data Subject" and "process" (in the context of usage of Personal Data) shall have the meanings given to them in the Data Protection Legislation.
- "Data Protection Lead" is the title given to the member of staff leading our data protection compliance programme in lieu of a requirement for a Data Protection Officer. Employees should also refer to the Data Privacy Notice for Employees, Workers and Contractors alongside this notice as applicable – available from the Data Protection Lead.
- You can find information about your rights under Data Protection Legislation [on the ICO website](#); understanding these might be helpful to you in understanding this notice.
- You can also find information about the lawful bases for processing your personal data [on the ICO website here](#).

About our processing of your data

We might collect, use, store and transfer different kinds of Personal Data about you which we have grouped together below. Please contact our Data Protection Lead if you would like any further details about the types of Personal Data that we process.

Reference	What categories of information about you do we process?	Why are we processing your data?	Where did we get your personal data from?
Marketing	<ul style="list-style-type: none">• Identity Data	To market to our clients. This processing is	Your email or telephone

	<ul style="list-style-type: none"> • Contact Data • Marketing and Communications Data 	conducted lawfully on the basis of 'our legitimate interests'.	communication with Us.
Service delivery.	<ul style="list-style-type: none"> • Identity Data • Contact Data • Financial Data • Transaction Data 	Delivering our services to you. This processing is conducted lawfully on the basis of 'performance of a contract'.	Information you have provided to us for this purpose in the course of our communications.
Legal defence.	<ul style="list-style-type: none"> • Identity Data • Contact Data • Financial Data • Transaction Data 	Defending ourselves against any potential legal claims in the future. This processing is conducted lawfully on the basis of 'our legitimate interests'.	Information you have provided to us in the course of our communications.

Making a Subject Access Request

You can exercise your right to access personal data held about you by emailing tiffany@tiffanykemp.com with the subject line: "Subject Access Request". When you submit a 'subject access request', you might need to provide confirmation of your identity. This is provided free of charge and our response will be made within thirty (30) days, unless an exception applies. If you believe we have made a mistake in evaluating your request, please see the section '[Who can you complain to?](#)'.

If you have questions about your rights with us, please contact our Data Protection Lead at tiffany@tiffanykemp.com.

Who is the Data Controller?

- If we have been passed your personal data from a third-party for a joint purpose that we both influence, we are a joint Data Controller. we will contact you to let you know about the acquisition (if we receive it indirectly) and who your point of contact is in relation to our processing before we first start to use your data, or, at the latest, within one month of acquiring it.

What are our 'legitimate interests'?

Legitimate interests are a flexible basis upon which the law permits the processing of an individual's personal data. To determine whether we have a legitimate interest in processing your data, we balance the needs of, and benefits to, us against the risks and benefits for you that are involved in us processing your data. This balancing is performed as objectively as possible by our Data Protection Lead. You are able to object to our processing and we shall consider the extent to which this affects whether we have a legitimate interest. If you would like to find out more about our legitimate interests, please contact dataprotection@devant.co.uk.

What profiling or automated decision making do we perform?

We do not perform any profiling or automated decision making based on your personal data.

How long will your personal data be kept?

We hold different categories of personal data for different periods of time. Wherever possible, we will endeavour to minimise the amount of personal data that we hold and the length of time for which it is held.

- If we process your data on the basis of 'legitimate interests', we will retain your data for as long as the purpose for which it is processed remains active. We review the status of our legitimate interests every 12 months and will update this notice whenever we determine that either a legitimate interest no longer exists or that a new one has been found.
- All categories of personal data that are held by us because they are essential for the performance of a contract, will be held for a period of six years, as determined by reference to the Limitations Act 1980, for the purposes of exercising or defending legal claims.

Who else will receive your personal data?

We pass your data to the third parties listed in the section '**Third Party Interests**' below.

Does your data leave the EU?

No, all personal data controlled or processed by us remains within the UK.

Yes. Details are included in the section '**Third Party Interests**' below.

Third Party Interests

Name/Category of Third Party Controller	What processing are we performing for them?	If they process data outside the EU, who is their representative within the EU?
HMRC, regulatory authorities or other authorities	We are joint controller with these authorities that require reporting of processing in some situations.	N/A
Postal/courier service providers	We are joint controller with these providers for the purposes of ensuring that you receive items that we send to you.	N/A
IT support service providers	We are joint controller with these providers where they might require access to personal data within our systems (under strict supervision) to remedy faults with our technology.	N/A
Payment services providers	We are joint controller with these providers who	N/A

administer any payments between you and us. These transactions are subject to the provider's privacy policies.

Our Data Processors

Name/Category of Third Party Processor	Purposes for carrying out processing	If applicable – where does data leaving the EEA go and what safeguards are in place?
Internal technology providers	<ul style="list-style-type: none"> • CRM/ERP software providers whose services we use in order to manage the business as it applies to you. • Telephony providers. • Office software providers, such as email clients. 	N/A
Marketing technology providers	<ul style="list-style-type: none"> • To enable us to send you our marketing emails. • To enable us to deliver targeted advertising online. 	We use marketing technology provided by MailChimp, the trading name of The Rocket Science Group LLC. This is a US company, which is certified under the Privacy Shield Framework.
Web hosting providers	Website hosting, including the storage of data forming the website content and processing your Technical Data (and Profile Data, where applicable) to provider you with access to our website.	N/A

Who can you complain to?

In addition to sending us your complaints directly to dataprotection@devant.co.uk, you can send complaints to our supervisory authority, the [Information Commissioner's Office](#).