

## Introduction

Nutley & Nutley Ltd ("us", "we", or "our") operates the [www.nutleys.com](http://www.nutleys.com) website (the "Service").

This page informs you of our policies regarding the collection, use, and disclosure of Personal Data when you use our Service and the choices and rights you have associated with that data. We are a data controller in respect of your Personal Data. This means that we make decisions about how to use your Personal Data for our business, and we are legally responsible for those decisions. We'll only use your Personal Data in accordance with the General Data Protection Regulation (GDPR) and other applicable laws. We'll obtain your consent to our use of your Personal Data where it's necessary or appropriate.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy.

## What data we collect

We collect several different types of information for various purposes to provide and improve our Service to you. Types of data Collected:

### Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- Email address;
- First name and last name;
- Phone number;
- Cookies and usage data.

We may collect your Personal Data from the following sources:

- You directly (e.g. from information which you provide to us in forms, documents and correspondence).
- You indirectly (e.g. information collected when you browse our website, such as your IP address).
- From third parties including search engines.
- Publicly available registers (e.g. the electoral roll and Companies House).
- Social media (e.g. LinkedIn, Facebook and Twitter).

### Usage Data

We may also collect information about how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

## What we do with the data we collect

Nutley & Nutley Ltd uses the collected data for various purposes:

- To provide and maintain the Service;
- Respond to an enquiry you make about our services;
- To notify you about changes to our Service;
- To allow you to participate in interactive features of our Service when you choose to do so;
- To provide customer care and support;
- To provide analysis or valuable information so that we can improve the Service;
- To monitor the usage of the Service;
- To detect, prevent and address technical issues;
- Comply with our legal obligations;
- Further our legitimate business interests (see legitimate interests section).

### Our Legitimate Interests

We may collect and use Personal Data for our legitimate interests, such as:

- Selling and supplying our products and services;
- Handling contacts, queries and disputes;
- Promoting, marketing and advertising our products and services;
- Understanding customer activities, preferences and needs;
- Improving our products and services;
- Complying with our legal obligations and handling legal claims.

## Your Consent To Our Use Of Your Personal Data

- There are six legal bases on which we may be entitled to collect and use your Personal Data, which means that your express consent is not always required.
- For example, the law allows us to collect and use Personal Data to perform contracts, where this is necessary for our legitimate interests – provided our use of the Personal Data is fair and balanced.
- We'll obtain your consent to our use of your Personal Data where this is necessary or appropriate, including where this is required for direct marketing purposes.
- Where you provide us with your consent, you can withdraw this at any time by contacting us at david@nutleys.com. Alternatively, you can write to us using the address details provided at the end of this policy document.

## Accuracy And Retention Of Personal Data

We verify Personal Data periodically to ensure that it's kept up-to-date.

We'll only retain Personal Data for as long as it's necessary for us to retain it. Generally, we'll retain Personal Data for the statutory retention and/or limitation period which is relevant to the Personal Data. When it's no longer necessary for us to retain your Personal Data, we'll securely delete it.

## Transfer Of Data

Your information, including Personal Data, may be transferred to and maintained on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside the United Kingdom and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United Kingdom and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Nutley & Nutley Ltd will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

## Disclosure Of Data

### Legal Requirements

Nutley & Nutley Ltd may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation;
- To protect and defend our rights or property;
- To prevent or investigate possible wrongdoing in connection with the Service;
- To protect the personal safety of users of the Service or the public;
- To protect against legal liability.

Where it's necessary for us to share your Personal Data with anybody else, we'll comply with all laws, including the GDPR.

## Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analysing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

### Analytics

We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information is used to create reports about the use of our website. Information about your use of our website (including your IP address) may be sent to Google and stored on servers outside of the EEA. Google would then use this information to help us to analyse and improve our website, including providing us with reports. Google may also be required to transfer the information to third parties where required to do so by law, or where third parties provide services on Google's behalf.

We'll only provide information to Google in accordance with Google's policies and the GDPR. Google is also required to comply with the GDPR. Google's privacy policy is available at:

<https://www.google.com/policies/privacy/>

## Links To Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we hold.

## Your Personal Data Rights

The GDPR provides you with the following rights:

- Your right to withdraw any consent you have given to our use of your Personal Data;
- Your right to obtain confirmation from us about whether we process your Personal Data, and if so, how;
- Your right to be provided with a copy of any Personal Data that we hold about you;
- Your right to object to our use of your Personal Data;
- Your right not to be subject to a decision made by us based on automated processing of Personal Data;
- Your right to the prompt correction and/or completion of any inaccurate and/or incomplete Personal Data that we hold about you;
- Your right to be informed if your Personal Data has been compromised;
- Your right to request us to transfer your Personal Data to a third party;
- In certain circumstances, you may have the right to be forgotten (i.e. to require us to delete your Personal Data);
- In certain situations, you may have the right to restrict how we use your Personal Data (e.g. where there is a disagreement about its accuracy or legitimate use);
- Your right to complain about us to a supervisory authority (in the UK, the Information Commissioner's Office).

## Changes To This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## Name And Address Of The Supervisory Authority

We are subject to the supervision of the Information Commissioner's Office whose contact details are as follows:

The Information Commissioner's Office,  
Wycliffe House,  
Wilmslow,  
Cheshire,  
SK9 5AF.  
United Kingdom  
Phone: +44(0) 303 123 1113,  
Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)  
website: <https://ico.org.uk>

## Contact Us

- This website is owned and operated by NUTLEY & NUTLEY LTD
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- Registered Office: The Rectory 1 Toomers Wharf, Canal Walk, Newbury, Berkshire, RG14 1DY.
- If you have any questions about this Privacy Policy, please contact us by email at [david@nutleys.com](mailto:david@nutleys.com) or telephone 07826 522774