

Privacy policy

Genobi Ltd understands that your privacy is important to you and that you care about how your personal data is used and share. We respect and value the privacy of our clients, their service-users and everyone who visits this website ("Our Site") and will only collect and use personal data in ways that are described here, and in a manner 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 Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site 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 Our Site;

Cookie means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 13, below;

Personal data means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR"); and

We/Us/Our means Genobi, a limited company registered in England under company number 07216945.

2. Information about us

- Our Site is owned and operated by Genobi, a limited company registered in England under company number 07216945.
- Our VAT number is GB 229529582.
- Our Data Protection Officer, Mrs E Hawkins, can be contacted by email at el@genobi.net.

3. What does this policy cover?

This Privacy Policy applies only to your use of Our Site and Our services. Our Site and Our Services may at some point 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. Your rights

- As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:
 - The right to be informed about Our collection and use of personal data;
 - The right of access to the personal data We hold about you (see section 12);
 - The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 14);
 - The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 14);
 - The right to restrict (i.e. prevent) the processing of your personal data;
 - The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
 - The right to object to Us using your personal data for particular purposes; and
 - Rights with respect to automated decision making and profiling.
- If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK’s supervisory authority, the Information Commissioner’s Office.
- For further information about your rights, please contact the Information Commissioner’s Office or your local Citizens Advice Bureau.
- We do not currently use Cookies on this website.
- Where We transfer any personal data outside the European Economic Area (“the EEA”, which consists of all EU member states plus Norway, Iceland, and Liechtenstein), We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under GDPR.
- You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details at el@genobi.net.
- If you have any questions about Our Site or this Privacy Policy, please contact Us by email at el@genobi.net. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12, below).
- We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

5. What data do we collect and process?

- We do not routinely collect data. We only collect data when it has been given to Us for an express purpose, such as when a client emails Us, in which case We would collect their email address to enable us to reply. Small divisions of Our company operate mailing lists which collect personal information comprising first name, last name, and email address. Explicit consent is given at the point of this data collection that the data may be used to supply the data subject with emails that they have opted into. This data is then processed by Mail Chimp (www.mailchimp.com).
- We are, in the main, a data processor. The conditions for processing are set out in Schedules 2 and 3 to the Data Protection Act. Unless a relevant exemption applies, at least one of the following conditions must be met whenever we process personal data:
 - The individual whom the personal data is about has consented to the processing.
 - The processing is necessary:
 - in relation to a contract which the individual has entered into; or
 - because the individual has asked for something to be done so they can enter into a contract.
 - The processing is necessary because of a legal obligation that applies to you (except an obligation imposed by a contract).
 - The processing is necessary to protect the individual's "vital interests". This condition only applies in cases of life or death, such as where an individual's medical history is disclosed to a hospital's A&E department treating them after a serious road accident.
 - The processing is necessary for administering justice, or for exercising statutory, governmental, or other public functions
 - The processing is in accordance with the "legitimate interests" condition.

At least one of the conditions listed above must be met whenever we process personal data. However, if the information is sensitive personal data, at least one of several other conditions must also be met before the processing can comply with the first data protection principle. These other conditions are as follows.

- The individual whom the sensitive personal data is about has given explicit consent to the processing.
- The processing is necessary so that you can comply with employment law.
- The processing is necessary to protect the vital interests of:
 - the individual (in a case where the individual's consent cannot be given or reasonably obtained), or
 - another person (in a case where the individual's consent has been unreasonably withheld).
- The processing is carried out by a not-for-profit organisation and does not involve disclosing personal data to a third party, unless the individual consents. Extra limitations apply to this condition.

- The individual has deliberately made the information public.
- The processing is necessary in relation to legal proceedings; for obtaining legal advice; or otherwise for establishing, exercising or defending legal rights.
- The processing is necessary for administering justice, or for exercising statutory or governmental functions.
- The processing is necessary for medical purposes, and is undertaken by a health professional or by someone who is subject to an equivalent duty of confidentiality.
- The processing is necessary for monitoring equality of opportunity, and is carried out with appropriate safeguards for the rights of individuals.

6. How do we use your data?

- All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under GDPR at all times. For more details on security see section 7, below.
- Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (eg by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:
 - Supplying Our products and services to you (please note that We require your personal data in order to enter into a contract with you);
 - Personalising and tailoring Our products and services for you;
 - Replying to emails from you;
 - Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by clicking the unsubscribe link at the bottom of any of the emails);
 - Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience.
- With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email with information, news and offers on Our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- We have a lawful basis for processing existing data on the grounds of legitimate interest as users have engaged with us before and we continue to send the same type of communications as the user initially requested.
- Third parties whose content appears on Our emails may use third party Cookies. Please note that We do not control the activities of such third parties, nor the

data they collect and use and advise you to check the privacy policies and Cookie policies of any such third parties.

- You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the purposes of processing the data only for as long as it is active. Data that we have collected, such as email addresses and telephone numbers of clients will be retained for five years after the end of the business relationship.

7. How and where do we store your data?

- We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.
 - Some or all of your data may be stored outside of the EEA. You are deemed to accept and agree to this by using Our Site and submitting information to Us. If We do store data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.
- Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.
- Steps We take to secure and protect your data include:
 - Data encryption
 - Access and sharing controls.

8. Do we share your data?

- Subject to the bullet points in this section (8), We will not share any of your data with any third parties for any purposes.
- We may sometimes contract with third parties to supply products and services to you on Our behalf. These may include payment processing, delivery of goods, and occasional outsourcing of aspects of contracts. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.
- Although We may sometimes use a third party data processor that is located outside of the EEA (Google Analytics - https://support.google.com/analytics/answer/6004245?hl=en&ref_topic=2919631) all of the data provided is anonymised at the point of collection.
- In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

9. What happens if our business changes hands?

- We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.
- In the event that any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted you will be given the choice to have your data deleted or withheld from the new owner or controller.

10. How can you control your data?

- In addition to your rights under the GDPR, set out in section 4, when you submit personal data via Our Site, you may be given options to restrict Our use of your 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 and at the point of providing your details and by managing your preferences).
- 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.

11. Your right to withhold information

You may access Our Site without providing any data at all. You do not have to provide personal information to enquire about our services.

12. How can you access your data?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details at el@genobi.net.

13. Our use of Cookies

We do not use Cookies on Our site.

14. Contacting us

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at el@genobi.net. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12, above).

15. Changes to our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.