

Privacy policy

1. Introduction

1.1 We are committed to safeguarding the privacy of [our website visitors and service users].

1.2 This policy applies where we are acting as a data controller with respect to

the personal data of [our website visitors and service users]; in other words,

where we determine the purposes and means of the processing of that

personal data.

1.3 We use cookies on our website. Insofar as those cookies are not strictly

necessary for the provision of [our website and services], we will ask you to

consent to our use of cookies when you first visit our website.

1.4 Our website incorporates privacy controls which affect how we will process

your personal data. By using the privacy controls, you can [specify whether

you would like to receive direct marketing communications and limit the

publication of your information].

1.5 In this policy, "we", "us" and "our" refer to [Axia Origin Limited].[For more

information about us, see Section 13.]

2. Source

2.1 This document is founded on resources from SEQ Legal

(<https://bit.ly/38BRb8j>).

3. How we use your personal data

3.1 In this Section 3 we have set out:

(a) the general categories of personal data that we may process;

(b) [in the case of personal data that we did not obtain directly from you,

the source and specific categories of that data];

(c) the purposes for which we may process personal data; and

(d) the legal bases of the processing.

3.2 We may process [data about your use of our website and services] ("usage

data"). The usage data may include [your IP address, geographical location,

browser type and version, operating system, referral source, length of visit,

page views and website navigation paths, as well as information about the

timing, frequency and pattern of your service use]. The source of the usage

data is [our analytics tracking system]. This usage data may be processed

[for the purposes of analysing the use of the website and services]. The legal

basis for this processing is [consent] OR [our legitimate interests, namely

[monitoring and improving our website and services]]

3.3 We may process [your website user account data] ("account data").[The

account data may [include your name and email address].][The source of

the account data is [you or your employer].] The account data may be

processed [for the purposes of operating our website, providing our services,

ensuring the security of our website and services, maintaining back-ups of

our databases and communicating with you.] The legal basis for this

processing is [consent] OR [our legitimate interests, namely [the proper

administration of our website and business]] OR [the performance of a

contract between you and us and/or taking steps, at your request, to enter

into such a contract].

3.4 We may process [information that you post for publication on our website or

through our services] ("publication data"). The publication data may be

processed [for the purposes of enabling such publication and administering

our website and services]. The legal basis for this processing is [consent] OR

[our legitimate interests, namely [the proper administration of our website

and business]] OR [the performance of a contract between you and us and/or

taking steps, at your request, to enter into such a contract].

3.5 We may process [information contained in any enquiry you submit to us

regarding goods and/or services] ("enquiry data"). The enquiry data may be

processed [for the purposes of offering, marketing and selling relevant goods

and/or services to you]. The legal basis for this processing is [consent] OR

[our legitimate interests, namely [the proper administration of our website

and business]] OR [the performance of a contract between you and us and/or

the taking steps, at your request, to enter into such a contract].

3.6 We may process [information relating to transactions, including purchases of

goods and/or services, that you enter into with us and/or through our

website] ("transaction data").[The transaction data may include [your

contact details, your card details and the transaction details].][The source of

the transaction data is [you and/or our payment services provider].] The

transaction data may be processed [for the purpose of supplying the

purchased goods and/or services and keeping proper records of those

transactions]. The legal basis for this processing is [the performance of a

contract between you and us and/or taking steps, at your request, to enter

into such a contract; providing that, if you are not the person contracting with

us, the legal basis for this processing is our legitimate interests, namely [the

proper administration of our website and business]].

3.7 We may process [information that you provide to us for the purpose of

subscribing to our email notifications and/or newsletters] ("notification

data"). The notification data may be processed [for the purposes of sending

you the relevant notifications and/or newsletters]. The legal basis for this

processing is [consent] OR [our legitimate interests, namely [communications

with our website visitors and service users]] OR [the performance of a

contract between you and us and/or taking steps, at your request, to enter

into such a contract].

3.8 We may process [any of your personal data identified in this policy] where

necessary for [the establishment, exercise or defence of legal claims, whether

in court proceedings or in an administrative or out-of-court procedure]. The

legal basis for this processing is our legitimate interests, namely [the

protection and assertion of our legal rights, your legal rights and the legal

rights of others].

3.9 We may process [any of your personal data identified in this policy] where

necessary for [the purposes of obtaining or maintaining insurance coverage,

managing risks, or obtaining professional advice]. The legal basis for this

processing is our legitimate interests, namely [the proper protection of our

business against risks].

3.10 In addition to the specific purposes for which we may process your personal

data set out in this Section 3, we may also process [any of your personal

data] where such processing is necessary[for compliance with a legal

obligation to which we are subject, or] in order to protect your vital interests

or the vital interests of another natural person.

3.11 Please do not supply any other person's personal data to us, unless we

prompt you to do so.

4. Providing your personal data to others

4.1 We may disclose [your personal data] to [our insurers and/or professional

advisers] insofar as reasonably necessary for the purposes of [obtaining or

maintaining insurance coverage, managing risks, obtaining professional

advice, or the establishment, exercise or defence of legal claims, whether in

court proceedings or in an administrative or out-of-court procedure].

4.2 Your personal data held in our [website database] OR will be stored [on the

servers of our hosting services providers].

4.3 In addition to the specific disclosures of personal data set out in this Section

4, we may disclose your personal data where such disclosure is necessary for

compliance with a legal obligation to which we are subject, or in order to

protect your vital interests or the vital interests of another natural person.[

We may also disclose your personal data where such disclosure is necessary

for the establishment, exercise or defence of legal claims, whether in court

proceedings or in an administrative or out-of-court procedure.]

5. International transfers of your personal data

5.1 In this Section 5, we provide information about the circumstances in which

your personal data may be transferred to [countries outside the European

Economic Area (EEA)].

5.2 The hosting facilities for our website are situated in [countries inside the

European Economic Area (EEA)]. [The European Commission has made an

"adequacy decision" with respect to [the data protection laws of each of these

countries].][Transfers to [each of these countries] will be protected by

appropriate safeguards, namely [the use of standard data protection clauses

adopted or approved by the European Commission].

5.4 You acknowledge that [personal data that you submit for publication through

our website or services] may be available, via the internet, around the world.

We cannot prevent the use (or misuse) of such personal data by others.

6. Retaining and deleting personal data

6.1 This Section 6 sets out our data retention policies and procedure, which are

designed to help ensure that we comply with our legal obligations in relation

to the retention and deletion of personal data.

6.2 Personal data that we process for any purpose or purposes shall not be kept

for longer than is necessary for that purpose or those purposes.

6.3 Notwithstanding the other provisions of this Section 6, we may retain your

personal data where such retention is necessary for compliance with a legal

obligation to which we are subject, or in order to protect your vital interests

or the vital interests of another natural person.

7. Your rights

7.1 In this Section 7, we have listed the rights that you have under data

protection law.

7.2 Your principal rights under data protection law are:

(a) the right to access - you can ask for copies of your personal data;

(b) the right to rectification - you can ask us to rectify inaccurate personal

data and to complete incomplete personal data;

(c) the right to erasure - you can ask us to erase your personal data;

(d) the right to restrict processing - you can ask use to restrict the

processing of your personal data;

(e) the right to object to processing - you can object to the processing of

your personal data;

(f) the right to data portability - you can ask that we transfer your

personal data to another organisation or to you;

(g) the right to complain to a supervisory authority - you can complain

about our processing of your personal data; and

(h) the right to withdraw consent - to the extent that the legal basis of our

processing of your personal data is consent, you can withdraw that

consent.

7.3 These rights are subject to certain limitations and exceptions. You can learn

more about the rights of data subjects by visiting <https://ico.org.uk/fororganisations/guide-to-data-protection/guide-to-the-general-data-protectionregulation-gdpr/individual-rights/>.

7.4 You may exercise any of your rights in relation to your personal data [by

written notice to us, using the contact details set out below].

8. About cookies

8.1 A cookie is a file containing an identifier (a string of letters and numbers) that

is sent by a web server to a web browser and is stored by the browser. The

identifier is then sent back to the server each time the browser requests a

page from the server.

8.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent

cookie will be stored by a web browser and will remain valid until its set

expiry date, unless deleted by the user before the expiry date; a session

cookie, on the other hand, will expire at the end of the user session, when the

web browser is closed.

8.3 Cookies do not typically contain any information that personally identifies a

user, but personal data that we store about you may be linked to the

information stored in and obtained from cookies.

9. Cookies that we use

9.1 We may use cookies for the following purposes:

(a) [authentication and status - we use cookies [to identify you when you

visit our website and as you navigate our website, and to determine if

you are logged into the website];

(b) [personalisation - we use cookies [to store information about your

preferences and to personalise the website for you];

(c) [security - we use cookies [as an element of the security measures

used to protect user accounts, including preventing fraudulent use of

login credentials, and to protect our website and services generally];

(d) [advertising - we use cookies [to help us to display advertisements that

will be relevant to you];

(e) [analysis - we use cookies [to help us to analyse the use and

performance of our website and services]; and

(f) [cookie consent - we use cookies [to store your preferences in relation

to the use of cookies more generally].

[additional list items]

10. Cookies used by our service providers

10.1 Our service providers use cookies and those cookies may be stored on your

computer when you visit our website.

10.2 We use Google Analytics. Google Analytics gathers information about the use

of our website by means of cookies. The information gathered is used to

create reports about the use of our website. You can find out more about

Google's use of information by visiting

<https://www.google.com/policies/privacy/partners/> and you can review

Google's privacy policy at <https://policies.google.com/privacy>.

10.3 We use Hotjar in order to better understand our users' needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users' experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices. This includes a device's IP address (processed during your session and stored in a de-identified form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and the preferred language used to display our website. Hotjar stores this information on our behalf in a pseudonymized user profile. Hotjar is contractually forbidden to sell any of the data collected on our behalf.

For further details, please see the ‘about Hotjar’ section of Hotjar’s support site at <https://help.hotjar.com/hc/en-us/categories/115001323967-About-Hotjar>

11. Managing cookies

11.1 Most browsers allow you to refuse to accept cookies and to delete cookies.

The methods for doing so vary from browser to browser, and from version to

version. You can however obtain up-to-date information about blocking and

deleting cookies via these links:

(a) <https://support.google.com/chrome/answer/95647> (Chrome);

(b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookieswebsite-preferences> (Firefox);

(c) <https://help.opera.com/en/latest/security-and-privacy/> (Opera);

(d) <https://support.microsoft.com/en-gb/help/17442/windows-internetexplorer-delete-manage-cookies> (Internet Explorer);

(e) <https://support.apple.com/en-gb/guide/safari/manage-cookies-andwebsite-data-sfri11471/mac> (Safari); and

(f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-andprivacy> (Edge).

11.2 Blocking all cookies will have a negative impact upon the usability of many websites.

11.3 If you block cookies, you will not be able to use all the features on our website.

12. Amendments

12.1 We may update this policy from time to time by publishing a new version on our website.

12.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

13. Our details

13.1 This website is owned and operated by [Axia Origin Limited].

13.2 We are registered in [England and Wales] under registration number

[12075975], and our registered office is at [4th Floor 18 St Cross Street,

London, England, EC1N 8UN].

13.3 You can contact us:

(a) [by post, to [the postal address given above] OR [the addresses

published on our website];

(b) [using our website contact form];

(c) [by email, using [the email address published on our website]].

14. Data protection officer

14.1 Our data protection officer's contact details are: [contact@axiaorigin.com].