

PARADISE | LONDON

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PRIVACY POLICY

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## **1. OUR CORE BELIEFS REGARDING USER PRIVACY AND DATA PROTECTION**

- ï User privacy and data protection are human rights
- ï We have a duty of care to the people within our data

## **2. RELEVANT LEGISLATION**

Along with our business and internal computer systems, this website is designed to comply with the following national and international legislation with regards to data protection and user privacy:

- ï UK Data Protection Act 1988 (DPA) [<http://www.legislation.gov.uk/ukpga/1998/29/contents>]
- ï EU Data Protection Directive 1995 (DPD) [<http://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:31995L0046>]

- ï EU General Data Protection Regulation 2018 (GDPR) [[http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L\\_.2016.119.01.0001.01.ENG&toc=OJ:L:2016:119:TOC](http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2016.119.01.0001.01.ENG&toc=OJ:L:2016:119:TOC)]

- ï Australian Privacy Act 1988 (APA) [<https://www.legislation.gov.au/Series/C2004A03712>]

## **3. PERSONAL INFORMATION THAT THIS WEBSITE COLLECTS AND WHY WE COLLECT IT**

This website collects and uses personal information for the following reasons:

### **3.1 SITE VISITATION TRACKING**

Like most websites, this site uses Google Analytics (GA) to track user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to see their journey through the website.

Although GA records data such as your geographical location, device, internet browser and operating system, none of this information personally identifies you to us. GA also records your computer's IP address which could be used to personally identify you but Google do not grant us access to this. This site has the "anonymizeIp" option implemented, meaning your full IP address is never written to disk as explained further in Google Analytics documentation [<https://support.google.com/analytics/answer/2763052?hl=en>]. We consider Google to be a third party data processor (see section 6.0 below).

GA makes use of cookies, details of which can be found on Google's developer guides. FYI our website uses the analytics.js implementation of GA. Disabling cookies on your internet browser will stop GA from tracking any part of your visit to pages within this website.

### **3.3 CONTACT FORMS AND EMAIL LINKS**

Should you choose to contact us using the contact form on our Contact Us page or any email link, none of the data that you supply will be stored by this website or passed to / be processed by any of the third party data processors defined in section 6.0. Instead the data will be collated into an email and sent to us over the Simple Mail Transfer Protocol (SMTP). Our SMTP servers are protected by TLS (sometimes known as SSL) meaning that the email content is encrypted using SHA-2, 256-bit cryptography before being sent across the internet. The email content is then decrypted by our local computers and devices.

### **3.4 MAILING LISTS**

If you choose to join our email newsletter, the email address that you submit to us will be forwarded to MailChimp who provide us with email marketing services. We consider MailChimp to be a third party data processor. The email address that you submit will not be stored within this website's own database or in any of our internal computer systems. Your email address will remain within MailChimp's database for as long as we continue to use MailChimp's services for email marketing or until you specifically request removal from the list. You can do this by unsubscribing using the unsubscribe links contained in any eMarketing that we send you or by requesting removal via email. When requesting removal via email, please send your email to us using the email account that is subscribed to our mailing list. While your email address remains within the MailChimp database, you will receive periodic (approximately once a month) newsletter-style emails from us. If you are under 16 years of age you MUST obtain parental consent before joining our email newsletter.

## **4. HOW WE STORE YOUR PERSONAL INFORMATION**

All data held by Paradise London is secure. Firewalls block all public access to our systems with the exception of secure browser (https), email and mobile network connections necessary to provide our services.

Key employees have access to our systems with multi-layer security in order to provide essential maintenance and development activity.

## **5. ABOUT THIS WEBSITE'S SERVER**

This website is hosted on our dedicated server provided by Bytemark Ltd. within a secure UK based data centre located in York. We consider Bytemark Ltd to be a third party data processor

All traffic (transferral of files) between this website and your browser is encrypted and delivered over HTTPS.

## **6. OUR THIRD PARTY DATA PROCESSORS**

We use a number of third parties to process personal data on our behalf. These third parties have been carefully chosen and all of them comply with the GDPR legislation set out in section 2.0. All 3 of these third parties are EU-U.S Privacy Shield compliant.

- ï [Google \(Privacy policy\)](#)
- ï [Mailchimp \(Privacy policy\)](#)

Furthermore, all client work is backed up on both: internal QNAP servers and offsite, encrypted servers

## **7. DATA BREACHES**

We will report any unlawful data breach of this website's database or the database(s) of any of our third party data processors to any and all relevant persons and authorities within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has been stolen.

## **8. DATA CONTROLLER**

The data controller of this website is:

Paradise London (UK) Limited, a UK Private Limited Company with company number: 8376976

Whose registered office is:

Paradise London  
11-13 Macklin Street  
London  
WC2B5NH

## **9. CHANGES TO PRIVACY POLICY**

This privacy policy may change from time to time inline with legislation or industry developments. We will not explicitly inform our clients or website users of these changes. Instead, we recommend that you check this page occasionally for any policy changes.

## **10. COOKIE POLICY**

This website uses cookies to better the users experience while visiting the website. Where applicable this website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer / device. This complies with recent legislation requirements for websites to obtain explicit consent from users before leaving behind or reading files such as cookies on a user's computer / device.

The cookies in use to deliver Google Analytics service are described below.

Cookie

\_\_utma\_\_utmb

\_\_utmc

\_\_utmv

\_\_utmz

Description

These cookies are used by Google Analytics to store information, such as what time your current visit occurred, whether you have been to the site before, and what site referred you to the web page. These cookies contain no personally identifiable information but they will use your computer's IP address to know from where in the world you are accessing the Internet.

Google stores the information collected by these cookies on servers in the United States. Google may transfer this information to third-parties where required to do so by law, or where such third-parties process the information on Google's behalf.

## 11. OPT-OUT

In order to provide website visitors with more choice on how data is collected by Google Analytics, Google has developed the Google Analytics Opt-out Browser Add-on. The add-on communicates with the Google Analytics JavaScript (ga.js) to stop data being sent to Google Analytics. The Google Analytics Opt-out Browser Add-on does not affect usage of the website in any other way. A link to further information on the Google Analytics Opt-out Browser Add-on is provided below for your convenience.

[Google Analytics opt-out](#)

For more information on the usage of cookies by Google Analytics please see the Google website. A link to the privacy advice for this product is provided below for your convenience.

[Google Analytics Privacy Policy](#).

## 12. DISABLING COOKIES

If you would like to restrict the use of cookies you can control this in your Internet browser. Links to advise on how to do this for the most popular Internet browsers are provided below for convenience and will be available for the Internet browser of your choice either online or via the software help (normally available via key F1).

- i [Google Chrome](#)
- i [Mozilla Firefox](#)
- i [Apple Safari](#)
- i [Windows Edge / IE](#)