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## PRIVACY POLICY

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### BACKGROUND:

We understand that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website. Our website does use cookies to identify users. Cookies will be used in the following examples, where you sign up to a newsletter, where you log into a website (“Our Site”) and (subject to the limited exceptions in section 6, below) We do not collect any other personal data about you unless you Contact Us (see section 5, below). Any personal data We do collect will only be used as permitted by 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:

“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 any relevant subsequent legislation from time to time in force; and
“We/Us/Our”	means Oxford HOB Limited a limited liability company registered in England under registration no.8844558 and with its registered address at 20 Cleveland Close, Maidenhead, Berkshire SL6 1XE and trading as HEART of business.

### 2. Information About Us

#### Our Data Controller

Is Oxford HOB Limited a limited liability company registered in England under registration no.8844558 and with its registered address at 20 Cleveland Close, Maidenhead, Berkshire SL6 1XE and can be contacted by email at [enquiries@heart-of-business.co.uk](mailto:enquiries@heart-of-business.co.uk).or, or by post at 20 Cleveland Close, Maidenhead, Berkshire SL6 1XE.

### 3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may 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

- 4.1 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 comply with:
  - 4.1.1 The right to be informed about our collection and use of personal data;
  - 4.1.2 The right of access to the personal data We hold about you (see section 8);
  - 4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 9);
  - 4.1.4 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 9);
  - 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
  - 4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
  - 4.1.7 The right to object to Us using your personal data for particular purposes; and
  - 4.1.8 Rights with respect to automated decision making and profiling.
- 4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 9 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. <https://ico.org.uk/>
- 4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

## 5. What Data Do We Collect?

- 5.1 Subject to section 5.2, We do not collect any personal data from you. We do place cookies on your computer or device which enable you to browse more effectively, cookies will collect personal information which is limited to your effective use of the website, We do not use any other means of data collection.
- 5.2 Cookies are small files which are stored on a user's computer. Cookies are designed to hold a small amount of data which is specific to a particular client and website, and can be accessed either by the web server or the client computer
- 5.3 If you send Us an email, we collect your name, your email address, and any other information which you choose to give Us. This data may be used for marketing purposes and to send you a reply.
- 5.4 You may also choose to provide your name, your email address, and other personal information by other means such as telephone or text. This data may be used for marketing purposes and to send you a reply.

## 6. **How Do We Use Your Data?**

- 6.1 If We do collect any personal data, it will be 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 the GDPR 2016 (and all relevant subsequent Data Protection Legislation) at all times. For more details on security see section 7, below.
- 6.2 As noted above, We do not generally collect any personal data except where the use of cookies is concerned. If you contact Us and We obtain your personal details, We may use them as follows:
  - 6.2.1 To reply;
  - 6.2.2 In connection with fulfilling any of Our contractual obligations to you;
  - 6.2.3 Providing you with information and news about Us and Our activities;
  - 6.2.4 For Health and Safety purposes.
- 6.3 Any and all emails containing your personal data will be deleted no later than 36 months after Our contractual relationship with you has ended.
- 6.4 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- 6.5 We will not share further any of your data with any third parties for any purposes without your express written consent, except where this is required in order to meet Our obligations to you under 6.2.

## 7. **How and Where Do We Store Your Data?**

- 7.1 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 your data may be stored outside of the European Economic Area ("the EEA"). If We do store data outside the EEA (this may be the case, for example, if an email server or data storage device is in a country 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.
- 7.2 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure any data We hold about you (even if it is only your email address).
- 7.3 Steps We take to secure and protect your data may include:
  - 7.3.1 Password protection;
  - 7.3.2 Dual factor authentication;
  - 7.3.3 Encryption (local and internet);
  - 7.3.4 Anonymisation;
  - 7.3.5 Pseudonymisation.

## 8. **How Can You Access Your Data?**

You have the right to ask for a copy of any of your personal data held by Us. No fee is payable. If you wish to do this please contact Our Data Controller (clause 2 above).

9. **Contacting Us**

If you have any questions about Our Site or this Privacy Policy, please contact Our Data Controller. 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 8, above). You may find it helpful to use the Information Commissioner's Template which forms the Schedule to this Policy.

10. **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.

## SCHEDULE – template from ICO website

[Your full address]

[Phone number]

[The date]

[Name and address of the organisation]

Dear Sir or Madam

### **Subject access request**

[Your full name and address and any other details to help identify you and the information you want.]

Please supply the information about me I am entitled to under the GDPR relating to: [give specific details of the information you want, for example

- your personnel file;
- emails between 'A' and 'B' (between 1/6/11 and 1/9/11);
- your medical records (between 2006 & 2009) held by Dr 'C' at 'D' hospital;
- CCTV camera situated at ('E' location) on 23/5/12 between 11am and 5pm;
- copies of statements (between 2006 & 2009) held in account number xxxxx).

If you need any more information from me, please let me know as soon as possible.

It may be helpful for you to know that a request for information under the GDPR should be responded to within 30 days.

If you do not normally deal with these requests, please pass this letter to your Data Controller. If you need advice on dealing with this request, the Information Commissioner's Office can assist you and can be contacted on 0303 123 1113 or at [ico.org.uk](http://ico.org.uk)

Yours faithfully  
[Signature]