



YOUR PRIVATE INVESTIGATOR LTD

PRIVACY POLICY

As a company we aim to exceed your expectations in all we do and seek to operate within a 'privacy by design' framework that reflects best practice.

At YPI, in relation to privacy, we are committed to:

Transparency | Simplicity | Control

OUR AIMS

We work to ensure that:

- We are fully transparent in all we do. Whether this is in relation to the terms and conditions of your booking or the data you entrust us with to deliver a highly private investigation service.
- We communicate effectively, using simple, easy-to-understand language. We want all involved with Your Private Investigator Ltd to be clear about what we do, how we do it and why we work the way we do.
- You have full control over your data.
- You are confident in our ability to work safely and with full regards to the law.

Your trust and confidence is a key priority for us.

BACKGROUND

At Your Private Investigator Ltd 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 comes in contact with our company including those who visit our website; www.yourprivateinvestigator.co.uk ("Our Site") as well as those who access our services as a Client. As a company we only collect and use personal data in the 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 signing of our Terms of Engagement document. Those wishing to make a booking with Your Private Investigator Ltd (and therefore opting to share further personal details) are explicitly asked to agree to our Terms of Engagement document as well as this Privacy Policy. Only those in agreement with our Terms of Engagement document and this Privacy Policy are able to access the services of our Private Investigation team.

DEFINITION 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, this means personal data that you give to Us via Our Site or via an external referral form that you submit to Your Private Investigator Ltd. It also includes data provided to us by potential team members during a recruitment process and that provided by team members to undertake their roles with us. This definition shall, where applicable, incorporate the definitions provided in EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR").

“We/Us/Our” Means the investigation service provider and includes all employees, agents and sub-contractors of the Your Private Investigator. The provider of services is Your Private Investigator Ltd. (The Parent Company). Your Private Investigator is a limited company registered in England under company number XXXX whose registered address is XXXX

“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 below;

ABOUT US

Our website is operated by Your Private Investigator Ltd Ltd (Company details above). Our Lead Data Protection Officer is Nigel Butfield and he can be contacted by email at info@yourprivateinvestigator.co.uk or by telephone on 07520 615030. Nigel Butfield also holds the position of Data Protection Officer. Your Private Investigator Ltd is registered with the Information Commissioners Office. Your Private Investigator Ltd takes its responsibility as data controller seriously.







SCOPE OF THIS POLICY

This Privacy Policy applies to your use of Our website and the delivery of Our Services as well as our handling of data in regards to our wider investigation team members. 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.

LEGAL FRAMEWORK





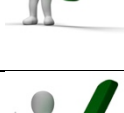

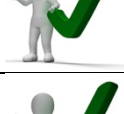

At Your Private Investigator Ltd we work in full compliance with the General Data Protection Regulation 2018 and Data Protection Act 2018. This came into force on 25th May 2018, building upon the foundations of the previous Data Protection Act 1998. GDPR it updates processes and procedures and aims to simplify compliance by providing a single law applicable to businesses in all EU countries, rather than having 28 different laws. GDPRP will still apply post-Brexit.

OUR RESPONSIBILITIES

	We will only collect and retain relevant and essential data. We will share this data only in the ways outlined, with organisations and individuals that are integral to the delivery of your service.
	We will store your information safely and securely, protecting it from loss, misuse, unauthorised access and disclosure.
	We will ensure that appropriate technical measures are in place to protect your personal data.
	We will destroy your information securely, holding data only for such time as is essential to achieve the purpose for which it was collected.
	We will work hard to keep your personal data up to date and accurate.
	We will comply fully with our obligations under the GDPR.

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 your personal data.
	The right of access to the personal data We hold about you.
	The right to rectification if any personal data We hold about you is inaccurate or incomplete.
	The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We hold personal data for the minimum time required to achieve the purpose for which it is collected. If you would like Us to delete your data sooner, please contact us.
	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.

WHAT IS THE LEGAL BASIS FOR OUR PROCESSING OF YOUR PERSONAL DATA?

Collecting your data, allows us to understand your needs and to provide personalised content and match the most relevant services for you. All data will only be collected with a legitimate reason as stipulated by GDPR.

Specifically, we collect and use you information in accordance with the GDPR legal basis as defined in Article 6 and Article 9 below:

Article 6 Lawful Processing

Processing shall be lawful only if and to what extent that the below requirements apply:

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.

Article 9 Lawful Processing

Explicit consent of the data subject - see our Terms of Engagement form.

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 fully with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see below.

Our use of your personal data will always have a lawful basis. Namely, in order to offer you a first-rate investigation service. Specifically, We may use your data for the following purposes:

- Supplying Our services to you (please note that We require your personal data in order to enter into a contract with you);
 - Personalising and tailoring Our service to our clients;
 - Replying to emails from you;
 - Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by emailing info@yourprivateinvestigator.co.uk).
 - Monitoring and evaluating the effectiveness of our services.
-
- We require a name, address, telephone number and email address for secure identification and correspondence during your use of our services.
 - We require contact details to inform you of any matter in relation to your case and It is necessary for our performance of a contract with you.
 - You have consented to our use of your personal data or
 - We are complying with a legal obligation or
 - It is necessary in pursuit of our legitimate interests
- Where our processing of your data is based on our legitimate interests, we will have ensured that such processing is necessary and we will not do so where our interests are over-riden by yours.
- Our legitimate interests include:
1. Selling and supplying our services to Clients and potential Clients.
 2. Handling Client and potential Client contacts, queries, complaints or disputes.
 3. Understanding our Clients' (or potential Clients') behaviour, activities, and preferences.
 4. Improving our products and services, including developing new products and services.
 5. Promoting, marketing, and advertising our goods and services.

In addition, like many websites, Ours uses cookies. Cookies are small pieces of information sent by an organisation to your computer or device and stored on your computer or device to allow a website to recognise you when you visit. They help us collect statistical data about your browsing actions and patterns but should not contain personal data, other than the cookie itself. All cookies used by and on our website are used in accordance with the current cookie law.

By giving us your consent, you are allowing us to provide the best experience of our website. You may refuse consent to cookies; however certain parts of our website may then not function correctly. You can alter your browser settings to refuse all cookies.

There are four types of cookies:

Strictly Necessary Cookies – These are essential to make a website work and provide features you've asked for. Generally, these are used to provide shopping baskets and similar. Without these cookies the website may not work as intended.

Performance Cookies – These collect anonymous information about users for the purposes of tracking the performance of a website. Common uses include well known analytics tools such as Google Analytics.

Targeting / Advertising Cookies – These are similar to performance cookies. However, they are used to track users' behaviour and that information is then used on a "per user" basis to advertise products / services on the basis of the behavioural information collected.

Functionality Cookies – These are used to remember automatically the choices that users have made in order to improve their experience on the website; for example selecting desired layout or language.

The cookies we use on Your Private Investigator website are strictly necessary cookies, Performance cookies by way of Google Analytics and Targeting/Advertising Cookies by way of Facebook Pixels.

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, telephone, text message and/or post with information, news, and offers.

Our private investigation 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 the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

HOW WE ENABLE YOU TO WITHDRAW CONSENT.

You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it. To withdraw your consent, you should email info@yourprivateinvestigator.co.uk.

HOW LONG WILL WE KEEP YOUR DATA?

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 following periods (or its retention will be determined on the following bases):

- All data retaining to your private investigation service will be fully deleted at the point of case closure. Case Closure occurs only upon completion of full payment.
- We do not retain data (other than records of financial past payments) post private investigation.
- In exceptional circumstances, at your request, we will retain your data in such circumstances as you envisage a future need to access our private investigation services. If, after a period of one year, you have not required our services, then your data will be deleted.

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 and/or for as long as We have your permission to keep it.

No data is stored on our website (with the exception of the cookies aforementioned).

At the time of completing your TERMS OF ENGAGEMENT form, a secure, password protected file is generated and stored by Your Private Investigator Ltd. This is stored securely in electronic format only and is accessed only by password.

All data is stored in the Cloud, using a secure Your Private Investigator Ltd Google Drive. Google confirm the importance of the European Commission's Data Protection Directive, passed by the European Union (EU) in 1995. This restricts the movement of data from the EU to non-EU countries that do not meet the EU's "adequacy" standard for privacy protection. Processing personal data strictly within the EU is one means of compliance with the Directive.

Some or all of your data stored securely on the Google Drive may be stored outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). 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.

HOW DO WE KEEP YOUR DATA SAFE?

At Your Private Investigator Ltd we take the safe collection and handling of your data very seriously. We have many safeguards in place to prevent personal information about you, and your family, from being lost and to prevent cyber-attacks, phishing, or other malicious activity.

Data provided by clients via the Terms of Engagement Form is not stored, at anytime, on our website. It is stored only in our secure, password protected, Google Drive.

All data is stored safely in cloud storage with no physical copies kept. Any breaches of data security will be reported to the ICO within 72 hours.

Receiving Email Accounts, The email account to which your data is sent is secure. It is password protected and, in addition, the hardware used to access the email is also password protected. No data is stored on memory sticks.

System Backups We use the latest technology to provide reliable access to your data and have processes to back up all data on a regular basis. All Your Private Investigator Ltd back-up systems are secure.

Payment information All payments at Your Private Investigator Ltd are processed via direct BACs transfer.

Needs Only Basis We only share your data with those who need it in order to deliver an effective and ethical service and only with those organisations and individuals we fully trust and, without whom, we would be unable to provide you with an effective service.

WHO MIGHT WE SHARE YOUR DATA WITH?

We will share your data only with third parties directly involved in the effective delivery, management or administration of the service you are purchasing. In the case of personal data held in regards to contractors and

other PI's we will similarly share your data only on restricted basis with those for whom access is considered essential. We recognise that, in exceptional 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 obligations, a court order, or a governmental authority. Where we share data, we will do so only when we are confident that the receiving organisation is fully compliant with the GDPR.

In addition, we note that there may be times when may wish to compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

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.

HOW CAN YOU CONTROL YOUR DATA?

We aim to give you strong controls on Our use of your data. We will never send you 'general marketing' and commit to sending only information and opportunities that are relevant to the private investigation service you access.

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.

YOUR RIGHT TO WITHHOLD INFORMATION

You may access Our Site without providing any data at all. However, in order to make a booking you will be required to submit or allow for the collection of certain data, without which we would be unable to offer a safe and effective private investigation service.

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). In accordance with GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us at info@yourprivateinvestigator.co.uk.

HOW CAN YOU CONTACT US?

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at info@yourprivateinvestigator.co.uk or by telephone on 07849989565. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you.

WHAT IF WE WANT TO CHANGE OUR USE OF YOUR DATA?

If we need to use your personal data for a new purpose, not covered by this Privacy Policy, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

WHAT HAPPENS IF WE WANT TO MAKE 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.

WHAT CAN YOU DO IF YOU HAVE CONCERNS?

If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided above 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.

The ICO can be contacted:

By post – The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.

By telephone – 0303 123 1113

Via its website – www.ico.org.uk

ENDS