

E J Markham & Son Ltd

PRIVACY POLICY: HOW WE USE YOUR INFORMATION

E J Markham & Son Ltd are committed to protecting your privacy. We take great care to ensure your information is kept safe and secure. For the purpose of the data protection law the data controller will be E J Markham & Son Ltd

This policy explains how we will collect, store, use and share your personal information. We collect information in a number of ways including when you use our website, visit our premises, email or phone us or come via third party site.

About us

We are E J Markham & Son Ltd a jeweller and pawnbroker. We are part of the Markerstudy Group of companies. We can be contacted at:

122/3 Priory Street
Colchester
Essex
CO1 2PX

Explanation of some of the terms used

Data Controller – means the person or entity which alone or jointly with others determines the purposes and means of the processing of personal data

Data Protection Law – the General Data Protection Regulation ((EU) 2016/679) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and then (ii) any successor legislation to the GDPR or the Data Protection Act 1998/2018.

Markerstudy Group – details of the Markerstudy Group can be found at [www.markerstudygroup.com/about us](http://www.markerstudygroup.com/about-us)

Sensitive Information – this is also known as **Special Category Data** and includes information revealing, or about a person's racial or ethnic origin, political opinions or trade union membership, religious or philosophical beliefs, health, sex life or sexual orientation, or genetic data and biometric data for the purpose of uniquely identifying a natural person. Information about criminal convictions is often included in this definition.

Data Controllers

For the purposes of the data protection law the data controller for the services we provide to you will be E J Markham & Son Ltd. We are registered with the ICO, registration number Z3257317

Data Protection Officer

We have appointed a Data Protection Officer to oversee our handling of personal information. Our Data Protection Officer can be reached at dataprotection@markerstudy.com.

Please click on the relevant section below for detailed information regarding how we process your information.

Who do we collect information about?

We collect information about the following types of individuals:

- Previous, current and prospective customers
- Users of the E J Markham Website
- Users of Third Party Site e.g. Ebay

When do we collect information about you?

We collect information about you:

- Details that you give us when you contact us (by phone, email, through our website or third party site), provide feedback, fill in forms or complete applications for goods/services.
- When you register to use our website, subscribe to our services, search for a product, leave any query or correspondence on our website, when you report a problem with our website or any other activity undertaken with the Markerstudy group.
- When you contact us to make a complaint.
- From our CCTV or Facial Recognition Systems
- For reporting of Incidents & Accidents

What information do we collect about you?

The personal information that we collect will depend on your relationship with us. We will collect different information depending on whether you are a customer, website user or third party.

Please note, in certain circumstances we may request and/or receive "sensitive" personal information about you. For example we may need access to health records for the purposes of providing you with a policy or processing claims, or details of any unspent criminal convictions for the purposes of preventing, detecting and investigating fraud.

If you provide personal information to us about other individuals you agree: (a) to inform the individual about the content of this Privacy Policy; and (b) to obtain any consent where we indicate that it is required for the processing of that individual's personal data in accordance with this Privacy Policy. Please click on the relevant section below for detailed information regarding the types of personal information we are likely to collect and use about you.

We collect and use details on the following:

Personal Information

- General information such as your name, address, email address and phone number.
- Identification information such as passport number, driving licence or Utility Bill
- Financial information such as credit card information and bank account details.
- Photograph or CCTV footage (If visiting our premises)
- We may collect information when you use our website including data that allows us to monitor your preferences and how you use our website. This helps us to organise our website content in order to improve your experience. The information we collect includes:
 - details of transactions you carry out through our website.
 - information that you provide by filling in forms on our website even if those forms are not submitted.

- technical information, including the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time).
- products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.
- We may use cookies to collect information about how our website is used. Please see our cookies policy for more information about our use of cookies.

Special Category (sensitive) Personal Information and Criminal Personal Information:

- We do not actively request details about sensitive personal information including criminal personal information. However it may be recorded if it is provided by you (or a third party) as part of the provision of services whether through phone, email, letter, or via a website

How do we collect your information?

We collect personal information from a number of different sources including:

- Directly from you
- From third parties (including business partners, suppliers, payment and delivery services, advertising networks, analytics providers, search information providers).

What are the purposes for which information about you is used?

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing. When the information that we process is classed as special category or sensitive personal information, we must have an additional legal ground for such processing.

Whether you provide us with the information, or we collect information from you or we are provided with information from other sources, we may use this information:

<p>a) To complete purchases or provide pawn broking services</p> <p>Legal grounds:</p> <ul style="list-style-type: none"> ● To carry out our obligations arising from the contract entered into between you and us
<p>b) Communicating with you and resolving any complaints that you might have</p> <p>Legal grounds:</p> <ul style="list-style-type: none"> ● Our having an appropriate business need to use your information to manage and respond to complaints which does not overly prejudice you
<p>c) Complying with our legal or regulatory obligations</p> <p>Legal grounds:</p> <ul style="list-style-type: none"> ● The use is necessary in order for us to comply with our legal obligations
<p>d) Recover outstanding payments</p> <p>Legal grounds:</p> <ul style="list-style-type: none"> ● Our having an appropriate business need to use your information in order to recover debts which does not overly prejudice you

e) To notify you about changes to our services or products

Legal grounds:

- Our having an appropriate business need to use your information to keep our customers up to date with changes to our products or services which does not overly prejudice you.

f) To administer our websites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes

Legal grounds:

- Our having an appropriate business need to use your information to maintain our websites which does not overly prejudice you.

g) To allow you to participate in interactive features of our services / website

Legal grounds:

- Our having an appropriate business need to use your information to offer an interactive website for customers which does not overly prejudice you.

CCTV Usage

Please note that we use CCTV and surveillance cameras which capture personal data about visitors to our sites. We use such surveillance to help monitor the health, safety and security of our visitors, guests and staff whilst on our sites.

Who do we share the information we collect about you with?

Sharing within our group

We may share your information within the Markerstudy Group for the following reasons:

- To administer our websites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
- To improve our website, including as part of our efforts to keep our website safe and secure
- For legal, financial reporting and regulatory purposes.

Sharing with third parties

We may also share your information with selected third parties, in order to offer services to you or to perform any necessary functions on our behalf. This may include:

- Your relatives, executors or, guardians (on your behalf where you are incapacitated or unable)
- Statutory Bodies
- Solicitors & Courts (Only if we need to issue Court Proceedings)

Disclosure of your personal information to a third party outside of the Markerstudy Group will only be made where the third party has agreed to keep your information strictly confidential and shall only be used for the specific purpose for which we provide it to them.

We may also share your information with:

- Search engine operators who can assist us in the improvement of our website.
- Prospective buyers, in the event that we sell any business or assets.

- Legal Advisors, Regulators and other authorised bodies, whenever we are required to do so by law.
- We believe that such disclosure is necessary in order to assist in the prevention or detection of any criminal action (including fraud) or is otherwise in the overriding public interest.

What is our approach to sending information overseas?

We do not send your data outside the European Economic Area (EEA) for processing and storage.

How long do we keep personal information for?

We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Policy and in order to comply with our legal and regulatory obligations. Most of our information will be deleted after 6 years as is outlined in our Data Retention Policy.

CCTV Data

As a general rule we will keep CCTV data for a period of 30 days unless there is a good reason under our General Criteria to apply a different period.

General Criteria

We may apply different retention periods where it is appropriate and proportionate under data protection laws to do so. As examples this could include situations where:

- There is an ongoing legal requirement to retain data;
- There is an ongoing contractual requirement to retain data;
- There is an ongoing request under UK data protection laws in respect of the data;
- We have determined that it is appropriate and proportionate to delete the data earlier than the above retention periods;
- We are deleting the data sooner in accordance with a request under data protection laws.

Automated decision making

We do not carry out automated decision making

What marketing activities do we carry out?

We do not actively market our products & services directly to you

Your rights

Under data protection law you have certain rights in relation to the personal information that we hold about you. You may exercise these rights at any time by contacting us using the details set out in the "How to Contact Us" section of this Privacy Policy.

Please note that in some cases we may not be able to comply with your request (e.g. we might not be able to delete your data) for reasons such as our own obligations to comply with other legal or regulatory requirements. However, we will always respond to any request you make and if we can't comply with your request, we will tell you why.

Your rights include:

The right to access your personal information

You have the right to access a copy of the personal information we hold about you and certain details of how we use it. There will not usually be a charge for dealing with these requests.

If you would like access to such information, please write to us at Data Protection Officer, 45 Westerham Road, Sevenoaks, Kent TN13 2QB. Alternatively, where you have made the request by electronic means, the information will be provided to you by electronic means where possible.

The right to rectification

We take reasonable steps to ensure that the personal information we hold about you is accurate and up to date. However, if you do not believe this is the case, you can ask us to update or amend it.

The right to erasure

In certain circumstances, you may ask us to erase your personal information.

The right to restriction of processing

In certain circumstances, you are entitled to ask us to stop using your personal information.

The right to data portability

In certain circumstances, you have the right to ask that we transfer any personal information that you have provided to us to another third party of your choice.

The right to object to marketing

You can ask us to stop sending you marketing messages at any time.

The right not to be subject to automated decision-making (including profiling)

You have a right not to be subject to a decision based solely on automated means. Please note that personal information including sensitive personal information may be used in the context of auto-renewal of certain types of policies which involves automated decision making to determine what the cost of renewing the policy will be. We will ask you when you purchase your policy if you would like to opt in to auto-renewal. However, even if you opted in at this point, you have the right to opt out at any point.

The right to withdraw consent

For certain uses of your personal information, we will ask for your consent. Where we do this, you have the right to withdraw your consent to further use of your personal information.

The right to lodge a complaint with the ICO

You have a right to complain to the Information Commissioner's Office (ICO) if you believe that any use of your personal information by us is in breach of applicable data protection laws and regulations.

More information can be found on the ICO's website at: www.ico.org.uk/concerns.

Making a complaint will not affect any other legal rights or remedies that you have.

How we protect your information

We will treat all of your information in strict confidence and we will endeavour to take all reasonable steps to keep your personal information secure once it has been transferred to our systems. We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorised access, alteration, disclosure or destruction of your personal information, and data stored on our IT systems, the website(s) and associated databases

Changes to our Privacy Policy

We keep our Privacy Policy under review and it is updated periodically. For example, those changes may be due to government regulation, new technologies, or other developments in data protection laws or privacy generally. You should check our website periodically to view the most up-to-date Privacy Policy.

This Privacy Policy was last updated on: 30th May 2018.

How to Contact Us

Please contact us if you have any questions about our Privacy Policy or information we hold about you by email to dataprotection@markerstudy.com or write to: Data Protection Officer, 45 Westerham Road, Sevenoaks, Kent TN13 2QB.

Other websites

Our website may contain links to other websites. This Privacy Policy only applies to our own website so when you link to other websites you should read their own privacy policies. If this policy conflicts with any written contract that we have with you then the written contract shall take precedence.

Complaints

If you have a complaint about how we use your information then please contact us at: Data Protection Officer, 45 Westerham Road, Sevenoaks, Kent TN13 2QB.

If you have a complaint about the way in which your data has been processed, you can contact the ICO at: www.ico.org.uk/concerns.