

Privacy Notice

This is the privacy notice of Siblinc. In this document, “we”, “our”, or “us” refer to Siblinc. Our company is registered in the United Kingdom. Our registered office is at 39a St Piran’s Road, Perranporth, Cornwall TR6 0BJ.

Introduction

This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you (“personal information”) and information that could not. In the context of the law and this notice, “process” means collect, store, transfer, use or otherwise act on information.

We regret that if there are one or more points below with which you are not happy, your only recourse is to leave our website immediately.

We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them, and will not accidentally fall into the hands of a third party.

We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.

Our policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).

The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. We do this now, by requesting that you read the information provided at www.knowyourprivacyrights.org

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

The bases on which we process information about you

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data.

If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

Information we process because we have a contractual obligation with you

When you create an account on our website, buy a product or service from us, or otherwise

agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- verify your identity for security purposes- sell products to you- provide you with our services- provide you with suggestions and advice on products, services and how to obtain the most from using our website

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to a particular service we provide. If we use it for this purpose, you as an individual will not be personally identifiable. We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

Information we process with your consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including our products and services, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.

Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our website.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us at <http://siblin.com/contact/>. However, if you do so, you may not be able to use our website or our services further.
Information we process for the purposes of legitimate interests

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of: record-keeping for the proper and necessary administration of our business. responding to unsolicited communication from you to which we believe you would expect a response protecting and asserting the legal rights of any party insuring against or obtaining professional advice that is required to manage our business's risk protecting your interests where we believe we have a duty to do so

Information we process because we have a legal obligation

We are subject to the law like everyone else. Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal information.

Specific uses of information you provide to us

Information provided on the understanding that it will be shared with a third party Our website allows you to post information with a view to that information being read, copied, downloaded, or used by other people.

Examples include:

- posting a message our forum
- tagging an image
- clicking on an icon next to another visitor's message to convey your agreement, disagreement or thanks

In posting personal information, it is up to you to satisfy yourself about the privacy level of every person who might use it.

We do store it, and we reserve a right to use it in the future in any way we decide.

Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.

Provided your request is reasonable and there is no legal basis for us to retain it, then at our discretion we may agree to your request to delete personal information that you have posted.

You can make a request by contacting us at <http://siblinc.com/contact/>.

Complaints regarding content on our website

If you complain about any of the content on our website, we shall investigate your complaint. If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

Free speech is a fundamental right, so we have to make a judgment as to whose right will be obstructed: yours, or that of the person who posted the content that offends you.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

Information relating to your method of payment

Payment information is never taken by us or transferred to us either through our website or otherwise. Our employees and contractors never have access to it.

At the point of payment, you are transferred to a secure page on the website of [WorldPay / SagePay / PayPal / MoneyBookers / Stripe] or some other reputable payment service provider. That page may be branded to look like a page on our website, but it is not controlled by us.

Information about your direct debit

N/A

Job application and employment

If you send us information in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for six years before destroying or deleting it.

Sending a message to our support team

When you contact us, whether by telephone, through our website or by email, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our business.

We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

Complaining

When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

Affiliate and business partner information

This is information given to us by you in your capacity as an affiliate of us or as a business partner.

It allows us to recognise visitors that you have referred to us, and to credit to you commission due for such referrals. It also includes information that allows us to transfer commission to you. The information is not used for any other purpose.

We undertake to preserve the confidentiality of the information and of the terms of our relationship.

We expect any affiliate or partner to agree to reciprocate this policy.

Use of information we collect through automated systems when you visit our website

Cookies

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved. Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.

Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

We may use cookies in the following ways:

- to track how you use our website
- to record whether you have seen specific messages we display on our website
- to keep you signed in our site
- to record your answers to surveys and questionnaires on our site while you complete them
- to record the conversation thread during a live chat with our support team

Personal identifiers from your browsing activity

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the web pages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

Our use of remarketing

Remarketing involves placing a cookie on your computer when you browse our website in order to be able to serve to you an advert for our products or services when you visit some other website. We may use a third party to provide us with remarketing services from time to time. If so, then if you have consented to our use of cookies, you may see advertisements for our products and services on other websites.

Disclosure and sharing of your information

Information we obtain from third parties

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

Third party advertising on our website

Third parties may advertise on our website. In doing so, those parties, their agents or other companies working for them may use technology that automatically collects information about you when their advertisement is displayed on our website.

They may also use other technology such as cookies or JavaScript to personalise the content of, and to measure the performance of their adverts.

We do not have control over these technologies or the data that these parties obtain. Accordingly, this privacy notice does not cover the information practices of these third parties.

Credit reference

To assist in combating fraud, we share information with credit reference agencies, so far as it relates to clients or customers who instruct their credit card issuer to cancel payment to us without having first provided an acceptable reason to us and given us the opportunity to refund

their money.

Data may be processed outside the European Union Our websites are hosted in the UK.

We may also use outsourced services in countries outside the European Union from time to time in other aspects of our business.

Accordingly data obtained within the UK or any other country could be processed outside the European Union.

We use the following safeguards with respect to data transferred outside the European Union:

- the processor is within the same corporate group as our business or organisation and abides by the same binding corporate rules regarding data processing.
- the data protection clauses in our contracts with data processors include transfer clauses written by or approved by a supervisory authority in the European Union.
- we comply with a code of conduct approved by a supervisory authority in the European Union.
- we are certified under an approved certification mechanism as provided for in the GDPR²- both our organisation and the processor are public authorities between whom there is either a legally binding agreement or administrative arrangements approved by a supervisory authority in the European Union relating to protection of your information

Access to your own information

Access to your personal information

At any time you may review or update personally identifiable information that we hold about you, by signing in to your account on our website.

To obtain a copy of any information that is not provided on our website you may send us a request at <http://siblinc.com/contact/>.

After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

Removal of your information

If you wish us to remove personally identifiable information from our website, you may contact us at <http://siblinc.com/contact/>.

This may limit the service we can provide to you.

Verification of your information

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

Other matters

Use of site by children

We do not sell products or provide services for purchase by children, nor do we market to children. If you are under 18, you may use our website only with consent from a parent or guardian Encryption of data sent between us

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

How you can complain

If you are not happy with our privacy policy or if have any complaint then you should tell us by email. Our address is hello@sibinc.com.

If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration. If you are in any way dissatisfied about how we process your personal information, you have a right

to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns/>

Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- to provide you with the services you have requested; - to comply with other law, including for the period demanded by our tax authorities; - to support a claim or defence in court.

Compliance with the law

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

However, ultimately it is your choice as to whether you wish to use our website.

Review of this privacy policy

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us.

GDPR

The policy: This privacy policy notice is for this website; [www.siblinc.com] and served by Siblinc, 39a St Piran's Road, Perranporth, Cornwall TR6 0BJ and governs the privacy of those who use it. The purpose of this policy is to explain to you how we control, process, handle and protect your personal information while browsing or using this website, including your rights under current laws and regulations. If you do not agree to the following policy you may wish to cease viewing / using this website.

Policy key definitions:

"I", "our", "us", or "we" refer to the business, Siblinc.

"you", "the user" refer to the person(s) using this website.

GDPR means General Data Protection Act.

PECR means Privacy & Electronic Communications Regulation.

ICO means Information Commissioner's Office.

Cookies mean small files stored on a users computer or device.

Processing of your personal data

Under the GDPR (General Data Protection Regulation) we control and / or process any personal information about you electronically using the following lawful bases.

We are exempt from registration in the ICO Data Protection Register because we are only processing personal data for the core business purposes.

Lawful basis: Consent

The reason we use this basis: for business purposes only

We process your information in the following ways: for business purposes only

Data retention period: We will continue to process your information under this basis until you withdraw consent or it is determined your consent no longer exists.

Sharing your information: We do not share your information with third parties.

Lawful basis: Contract

The reason we use this basis: for business purposes only

We process your information in the following ways: for business purposes only

Data retention period: We shall continue to process your information until the contract between us ends or is terminated under any contract terms.

Sharing your information: We do not share your information with third parties.

Lawful basis: Legal obligation

The reason we use this basis: for business purposes only

We process your information in the following ways: for business purposes only

Data retention period: five years

Sharing your information: We do not share your information with third parties.

Lawful basis: Vital interests

The reason we use this basis: for business purposes only

We process your information in the following ways: for business purposes only

Data retention period: five years

Sharing your information: We do not share your information with third parties.

Lawful basis: Public task

The reason we use this basis: for business purposes only

We process your information in the following ways: for business purposes only

Data retention period: five years

Sharing your information: We do not share your information with third parties.

Lawful basis: Legitimate interests

The reason we use this basis: for business purposes only

We process your information in the following ways: for business purposes only

Data retention period: five years

Sharing your information: We do not share your information with third parties.

Lawful basis: Special category data

The reason we use this basis: for business purposes only

We process your information in the following ways: for business purposes only

Data retention period: five years

Sharing your information: We do not share your information with third parties.

Lawful basis: Criminal offence data

The reason we use this basis: for business purposes only

We process your information in the following ways: for business purposes only

Data retention period: five years

Sharing your information: We do not share your information with third parties.

If, as determined by us, the lawful basis upon which we process your personal information changes, we will notify you about the change and any new lawful basis to be used if required. We shall stop processing your personal information if the lawful basis used is no longer relevant.

Your individual rights

Under the GDPR your rights are as follows. You can read more about your rights in details [here](#);

the right to be informed;

the right of access;

the right to rectification;

the right to erasure;

the right to restrict processing;
the right to data portability;
the right to object; and
the right not to be subject to automated decision-making including profiling.
You also have the right to complain to the ICO [www.ico.org.uk] if you feel there is a problem with the way we are handling your data.

We handle subject access requests in accordance with the GDPR.

Internet cookies

We use cookies on this website to provide you with a better user experience. We do this by placing a small text file on your device / computer hard drive to track how you use the website, to record or log whether you have seen particular messages that we display, to keep you logged into the website where applicable, to display relevant adverts or content, referred you to a third party website.

Some cookies are required to enjoy and use the full functionality of this website.

We use a cookie control system which allows you to accept the use of cookies, and control which cookies are saved to your device / computer. Some cookies will be saved for specific time periods, where others may last indefinitely. Your web browser should provide you with the controls to manage and delete cookies from your device, please see your web browser options.

We may use cookies in the following ways:

- to track how you use our website
- to record whether you have seen specific messages we display on our website
- to keep you signed in our site
- to record your answers to surveys and questionnaires on our site while you complete them

Data security and protection

We ensure the security of any personal information we hold by using secure data storage technologies and precise procedures in how we store, access and manage that information. Our methods meet the GDPR compliance requirement.

Transparent Privacy Explanations

We have provided some further explanations about user privacy and the way we use this website to help promote a transparent and honest user privacy methodology.

Sponsored links, affiliate tracking & commissions

Our website may contain adverts, sponsored and affiliate links on some pages. These are typically served through advertising partners; Google AdSense, eBay Partner Network, Amazon Affiliates, or are self served through our own means. We only use

trusted advertising partners who each have high standards of user privacy and security. However we do not control the actual adverts seen / displayed by our advertising partners. Our ad partners may collect data and use cookies for ad personalisation and measurement. Where ad preferences are requested as 'non-personalised' cookies may still be used for frequency capping, aggregated ad reporting and to combat fraud and abuse.

Clicking on any adverts, sponsored or affiliate links may track your actions by using a cookie saved to your device. You can read more about cookies on this website above. Your actions are usually recorded as a referral from our website by this cookie. In most cases we earn a very small commission from the advertiser or advertising partner, at no cost to you, whether you make a purchase on their website or not.

We use advertising partners in these ways to help generate an income from the website, which allows us to continue our work and provide you with the best overall experience and valued information.

If you have any concerns about this we suggest you do not click on any adverts, sponsored or affiliate links found throughout the website.

Email marketing messages & subscription

Under the GDPR we use the consent lawful basis for anyone subscribing to our newsletter or marketing mailing list. We only collect certain data about you, as detailed in the "Processing of your personal data" above. Any email marketing messages we send are done so through an EMS, email marketing service provider. An EMS is a third-party service provider of software / applications that allows marketers to send out email marketing campaigns to a list of users.

Email marketing messages that we send may contain tracking beacons / tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of data such as; times, dates, I.P addresses, opens, clicks, forwards, geographic and demographic data. Such data, within its limitations will show the activity each subscriber made for that email campaign.

Any email marketing messages we send are in accordance with the GDPR and the PECR. We provide you with an easy method to withdraw your consent (unsubscribe) or manage your preferences / the information we hold about you at any time. See any marketing messages for instructions on how to unsubscribe or manage your preferences, you can also unsubscribe from all MailChimp lists, by following this link, otherwise contact the EMS provider.

Our EMS provider is Mailchimp. We hold the following information about you within our EMS system;

Email address

I.P address

Name

Job Title

Business name

Subscription time & date

Resources & further information

[Overview of the GDPR - General Data Protection Regulation](#)

[Data Protection Act 1998](#)

[Privacy and Electronic Communications Regulations 2003](#)

[The Guide to the PECR 2003](#)

[Twitter Privacy Policy](#)

[Facebook Privacy Policy](#)

[Google Privacy Policy](#)

[Linkedin Privacy Policy](#)

[Mailchimp Privacy Policy](#)