

# 1. Introduction

- 1.1 We are committed to safeguarding the privacy of this website's visitors.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website, we will ask you to consent to our use of cookies when you first visit our website.
- 1.4 In this policy, "we", "us" and "our" refer to Adriana Sandru.

## 2. Credit

- 2.1 This document was created using a template from SEQ Legal (<https://seqlegal.com/free-legal-documents/privacy-policy>).

## 3. How we use your personal data

- 3.1 In this Section 3 we have set out:
  - (a) the general categories of personal data that we may process;
  - (b) the purposes for which we may process personal data; and
  - (c) the legal bases of the processing.
- 3.2 We may process information contained in any enquiry you submit to us regarding services ("enquiry data"). The enquiry data may be processed for the purposes of offering relevant services to you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.
- 3.3 Please do not supply any other person's personal data to us, unless we prompt you to do so.

## 4. Providing your personal data to others

- 4.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 4.2 Your personal data held in our website database will be stored on the servers of our hosting services providers.
- 4.3 We may disclose specify personal data category or categories to our suppliers or subcontractors insofar as reasonably necessary for specify purposes.

4.4 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

## **5. Retaining and deleting personal data**

5.1 This Section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

5.3 We will retain your personal data as follows:

(a) enquiry data will be retained for a minimum period of 12 months following the date of the enquiry, and for a maximum period of 10 years following that date;

5.4 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **6. Your rights**

6.1 In this Section 6, we have listed the rights that you have under data protection law.

6.2 Your principal rights under data protection law are:

(a) the right to access – you can ask for copies of your personal data;

(b) the right to rectification – you can ask us to rectify inaccurate personal data and to complete incomplete personal data;

(c) the right to erasure – you can ask us to erase your personal data;

(d) the right to restrict processing – you can ask us to restrict the processing of your personal data;

(e) the right to object to processing – you can object to the processing of your personal data;

(f) the right to data portability – you can ask that we transfer your personal data to another organisation or to you;

(g) the right to complain to a supervisory authority – you can complain about our processing of your personal data; and

(h) the right to withdraw consent – to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

6.3 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

6.4 You may exercise any of your rights in relation to your personal data by written notice to us, using the contact details set out below.

## 7. About cookies

7.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

7.2 Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

7.3 Cookies do not typically contain any information that personally identifies a user, but personal data that we store about you may be linked to the information stored in and obtained from cookies.

## 8. Cookies that we use

8.1 We use cookies for the following purposes:

(a) marketing – we use cookies for displaying thhe Twitter feed; cookies used for this purpose are: \_\_widgetsettings and local\_storage\_support\_test;

## 9. Cookies used by our service providers

9.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

9.2 We use Google Analytics. Google Analytics gathers information about the use of our website by means of cookies. The information gathered is used to create reports about the use of our website. You can find out more about Google’s use of information by visiting <https://www.google.com/policies/privacy/partners/> and you can review Google’s privacy policy at <https://policies.google.com/privacy>:

## 10. Managing cookies

10.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <https://help.opera.com/en/latest/security-and-privacy/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

(Safari); and

(f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

10.2 Blocking all cookies will have a negative impact upon the usability of many websites.

10.3 If you block cookies, you will not be able to use all the features on our website.

## **11. Amendments**

11.1 We may update this policy from time to time by publishing a new version on our website.

11.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

## **12. Our details**

12.1 This website is owned and operated by Adriana Sandru.

12.2 Our principal place of business is at Centre d’Affaires Poincaré, 3, Rue Poincaré, Nice, 06000, France.

12.4 You can contact us:

(a) by post, to the postal address given above;

(b) using our website contact form;