

ESavage - Privacy Notice



I, Ethan Savage, and my online services business, ESavage, are collectively committed to protecting the privacy and security of your personal data. This Privacy Notice is to provide you with information regarding the processing of information about you for service-related and other general purposes, and to provide you with information on further processing that may be necessary when you agree to purchase certain services.

My contact details are:

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What personal data do I use?

I may collect, store, and use the following categories of personal data about you: Your name, date of birth, email, business-related online passwords (within reason), telephone numbers and certain elements of financial data (to an extent), occupation, source of funds and Politically Exposed Status.^{1,2}

ESavage will use your personal data to assist it in carrying out the following:

- Opening and maintain any accounts which are required for you to possess and manage the products I provide See list of trusted organisations I use, which is found at the end of this policy document
- Contacting you in respect of your online accounts and any product or service you avail of under my management or in relation to a purchase which you have made from me
- Helping you manage and store online files and integrate storage systems with online profiles
- Contacting you in relation to any updates made to my services which may be of interest to you or your business

We may also collect, store and use the following “special categories” of more sensitive personal data:

- Payment details²
- Passwords¹
- Business information in order to display relevant contact details, connect communication systems to your business and allow clients to easily find and contact you
- Client information, in the interest of contacting large collections of clients on your behalf.

How I use particularly sensitive personal data:

“Special categories” of particularly sensitive personal data require higher levels of protection. I need to have further justification for collecting, storing and using this type of personal data. I may process special categories of personal data in the following circumstances:

1. In limited circumstances, with your explicit written consent or by supervising you during the process of submitting your details to specific services sites and trusted products
2. Where I need to carry out any legal obligations and in line with my data protection policy

¹ Passwords collected will allow me access to ownership accounts for Wix and any chosen social media or search engine profiles, primarily. This may allow me to process important account actions on your behalf depending on preference. In the case of accounts outside Wix, I may keep records of domain provider passwords, domain-specific email account passwords and account details for any third-party apps which you choose to attach to your website, Wix account, social media pages or otherwise.

² In cases of collecting financial data, I will only ever take details to accept payments or to process payments to apps or services which you have chosen outside my own under my direct supervision. I will never process a financial transaction or access your financial data without you being present or without explicit permission being given in advance.

3. Where it is needed in the public interest, and in line with my data protection policy.

Less commonly, I may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

How Secure is My Information with Third-Party Service Providers?

All my third-party service providers are required to take appropriate security measures to protect your personal data. I do not allow our third-party service providers to use your personal data for their own purposes unless they are deemed to be controllers in their own right. Accounts which I help you create will have their own privacy policies which you can consult in the event that you are unhappy with how they may have handled your data.

I only permit third parties (see list of trusted organisations) to process your personal data for specified purposes and in accordance with specific instructions. I will never create an account for your brand or business without being in direct contact with you while doing so, most likely in person and through the medium of supervision. Usually, information will be anonymised but this may not always be possible. The recipient of the information will also be bound by confidentiality obligations.

If you fail to provide personal data If you fail to provide certain information when requested, I may not be able to fully perform the agreement I have entered into with you or I may be prevented from complying with my legal obligations.

Change of Purpose

You can be assured that I will only ever use your data for the purpose it was provided and in ways compatible with that stated purpose. If I need to use your personal data for an unrelated purpose, I will notify you and I will explain all relevant information.

Data Retention Periods

I will only retain your personal data for as long as necessary to fulfil the purpose(s) for which it was obtained, taking into account any legal/contractual obligation to keep it. Where possible I record how long I will keep your data, where that is not possible, I will explain the criteria for the retention period. Once the retention period has expired, the respective data will be permanently deleted If you require further information please contact me.

- Once the retention period has expired, any respective data will be permanently deleted.
- Any and all client details and information will be retained for as long as my services are paid for and being carried out. If clients discontinue services or agree to end services for any reason, I will retain their contact details and account records with third-party organisations (provided they are not changed without my knowledge) for six months before permanently deleting them.

Planned data transmission to third countries

There are no plans for a data transmission to third countries.

Updates to this notice

I may make changes to this notice from time to time, particularly if I change how I use your information, and change my technology and products. You can always find an up-to-date version of this notice on my website at www.ejwsavage.com or you can ask for a copy.

My use and sharing of your information

I will collect and use relevant information about you, your transactions in relation to my services, your use of my products and services, and your relationships with me. I will typically collect and use this information for the following purposes:

- Fulfilling contract This basis is appropriate where the processing is necessary for me to manage your accounts and online services to you
- Administrative Purposes: I will use the information provided by you, either contained in this form or any other interaction to help me to manage accounts which you create under my supervision which allow me to manage your online profiles and brand appearance and in certain cases to help you manage client files which are stored online
- Third parties: I appoint external third parties to facilitate certain functions on my behalf. I will ensure that any information passed to third parties conducting operational functions on my behalf will do so with respect for the security of your data and will be protected in line with data protection law and any systems of data protection held up by the third parties themselves. See the list of trusted organisations I use at the end of this policy document
- Electronic Payments (via online banking or debit card): When you use electronic payment services to transfer money to me as payment, I am required to share your personal data with my bank and electronic payment service provider (trusted organisations list)

My Legal Duty

This basis is appropriate when I am processing personal data to comply with UK or Northern Ireland Law.

- Tax liability: In cases when I am setting up services which directly impact your income (ecommerce sites, online stores, ticket sales etc.), I am responsible as a UK citizen to make reports to HMRC if you are not legally managing the income which is being made available to you by my services
- GDPR: I, when managing your online profiles, will ensure that all client contact best protects client data, but if I am suspicious of how you yourself are managing client data, I will take action to ensure that an illegitimate behaviour is handled by relevant legal bodies and/or authorities
- General Legal Behaviour: While I work in order to aid your business in any way I can, I will not hesitate to refuse service to you and report you to relevant authorities in any case in which I suspect illegitimate practise.

Legitimate interests

A legitimate interest is when I have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If I rely on my legitimate interest, I will tell you what that is.

Your Consent to Marketing and Market Research

To help improve and measure the quality of my products and services I undertake market research from time to time. This may include using specialist market research companies.

Your Rights in connection with your personal data are to:

- To find out whether I hold any of your personal data and if I do to request access to that data that to be furnished a copy of that data. You are also entitled to request further information about the processing
- Request correction of the personal data that I hold about you. This enables you to have any incomplete or inaccurate information I hold about you rectified
- Request erasure of your personal information. This enables you to ask me to delete or remove personal data where there is no good reason for me continuing to process it. You also have the right to ask me to delete or remove your personal data where you have exercised your right to object to processing (see below)
- Object to processing of your personal data where I am relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where I am processing your personal data for direct marketing purposes
- Request the restriction of processing of your personal information. You can ask me to suspend processing personal data about you, in certain circumstances
- Where I am processing your data based solely on your consent you have a right to withdraw that consent at any time and free of charge
- Request that I: a) provide you with a copy of any relevant personal data in a reusable format; or b) request that I transfer your relevant personal data to another controller where it's technically feasible to do so. Relevant personal data is personal data that: You have provided to me or which is generated by your use of my services. Which is processed by automated means and where the basis that I process it is on your consent or on an agreement that you have entered into with me
- You have a right to complain to the Information Commissioners Office (ICO) in respect of any processing of your data by;

Tel: 028 9027 8757 or 0303 123 1114 Email: ni@ico.org.uk

Post: ICO, 3rd Floor, 14 Cromac Place, Belfast, BT7 2JB

Please note that the above rights are not always absolute and there may be some limitations.

If you want access and or copies of any of your personal data or if you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that I send you a copy/a third party a copy your relevant personal data in a reusable format please contact me using the listed contact details above.

There is no fee in using any of your above rights, unless your request for access is clearly unfounded or excessive. I also reserve the right to refuse to comply with the request in such circumstances.

I may need to verify your identity if I have reasonable doubts as to who you are. This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it. I want the service provided by us to meet your expectations at all times. Please help me by immediately notifying me if there are any changes.

List of Trusted Third-Party Organisations I Use

- Wix and associated apps, networks and available integrations
- Facebook and affiliated social networks such as Instagram
- Twitter and associated social networks
- Google and associated software and social networks such as youTube
- Wordpress
- MS OneDrive and associated software
- SumUp
- Starling Bank
- PayPal (although not preferred)