
PRIVACY NOTICE

BACKGROUND:

Touchstone Developments & Investments Ltd (“Touchstone”) respects your privacy and is committed to protecting your Personal Data. This Privacy Notice will inform you as to how we look after your Personal Data, tell you about your privacy rights and how the law protects you.

Please make sure you read this Privacy Notice carefully to ensure you understand how and why we are using your data.

1. Contact details

Our full details are:

Full name of legal entity:	Touchstone Developments & Investments Ltd
Name of Data Protection Contact:	Anne Tew
Email address:	annetew@chrysalisgroupservices.co.uk
Postal address:	3 Brook Office Park, Emersons Green, Bristol BS16 7FL
Telephone number:	0300 365 4040

2. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Account”	means an account required to access and/or use certain areas and features of Our Site;
“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 in Part 14, below; and

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. 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.

4. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

In simple terms, personal data is any information about you that enables you to be

identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. Your Legal Rights

Under certain circumstances, you have rights under data protection laws to request the following:

- Request access to your Personal Data.
- Request correction of your Personal Data.
- Request erasure of your Personal Data.
- Object to processing of your Personal Data.
- Restrict processing your Personal Data.
- Request the transfer of your Personal Data.
- Withdraw any consent that you have previously given.

If you wish to exercise any of the rights set out above, please contact our Data Protection Contact on companysecretary@chrysalisgroupservices.co.uk. You can also contact the Information Commissioner's Office via <https://ico.org.uk/> for information, advice or to make a complaint.

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

6. Data Collection

Depending upon your use of Our Site, we may collect and hold some or all of the personal data set out in the table below, using the methods also set out in the table. Please also see Part 14 for more information about our use of Cookies and similar technologies. We do not collect any 'special category' or 'sensitive' personal data, personal data relating to children, or data relating to criminal convictions and/or offences.

Data Collected	How We Collect the Data
Contact information including your name, your email, and any additional information you choose to provide.	Completed contact form and newsletter sign-up.

7. How We Use Your Personal Data

We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:

8. Purpose For Using Your Personal Data

We have set out below, in a table format, a description of all the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your Personal Data under more than one lawful basis depending on the specific purpose for which we are using your data. Please contact us if you need additional details about the specific legal basis, we are relying on to process your Personal Data where more than one basis has been set out in the table below.

What We Do / Purpose	What Data We Use	Our Lawful Basis
Supplying our services to you.	Contact information including your name, your email, and any additional information you choose to provide.	Consent.
Communicating with you.	Your name, your email, and any additional information you choose to provide.	Consent.
Supplying you with information by email that you have opted-in-to (you may opt-out at any time by contacting us).	E-mail.	Consent.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 15.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

9. **Change of Purpose**

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose and the law

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

10. **Data Retention**

We will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Contact information including your name, your email, and any additional information you choose to provide.	Until consent is withdrawn, or when your data is no longer necessary for the purpose for which it was collected (whichever occurs sooner).

11. **Data Storage**

We will only store your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

12. **Data Sharing**

We may share your personal data with other companies in our group acting as processors or joint controllers. This includes our holding company and its subsidiaries.

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 9.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

13. **How You Can Control Your Personal Data**

In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Site, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails.

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.

14. **Can You Withhold Information?**

You may access certain areas of Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Part 14.

15. **How We Use Cookies**

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

All Cookies used by and on Our Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.

Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown in the table below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

The following first-party Cookies may be placed on your computer or device:

Name of Cookie	Purpose	Strictly Necessary
Session Cookies	Maintain user's session while navigating site.	Yes
Security Cookies	Protects from malicious attacks.	Yes
Regional Cookies	Remembers user's location.	No
Form Memory Cookies	Remembers form inputs.	No
Analytical Cookies	Used for tracking site performance to improve site usability, increase traffic and identifying popular content.	No

Our Site uses analytics services provided by Google. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how Our Site is used. This, in turn, enables us to improve Our Site and the services offered through it.

The analytics service(s) used by Our Site use(s) Cookies to gather the required information. You do not have to allow us to use these Cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable us to continually improve Our Site, making it a better and more useful experience for you.

The analytics service(s) used by Our Site use(s) the following Cookies:

Name of Cookie	Provider	Purpose
Page Interactions	Google	Records anonymised interaction
Analytics ID	Google	Records site and page visits
Performance Data	Google	Measure site performance
Analytics Session	Google	Groups page views into session

In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

Our Site uses analytics services provided by Google, which also use Cookies. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling us to better understand how people use Our Site.

16. Contact Us

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Data Protection Contact):

Email address: companysecretary@chrysalisgroupservices.co.uk.

Telephone number: 0300 365 4040 .

Postal Address: 3 Brook Office Park, Emersons Green, Bristol BS16 7FL

17. Changes to this Privacy Policy

Although most changes are likely to be minor, Touchstone may change its Privacy Policy from time to time at its discretion. Touchstone encourages visitors to frequently check this page for any changes to its Privacy Policy. Your continued use of this site after any change in this Privacy Policy will constitute your acceptance of such change.