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## PRIVACY POLICY

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### BACKGROUND:

Gravity Cycles Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, [www.gravitycycles.co.uk](http://www.gravitycycles.co.uk) and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy [is deemed to occur upon your first use of **our** Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

### 1. Definitions and Interpretation

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

“ <b>Account</b> ”	means an account required to access and/ use certain areas and features of Our Site;
“ <b>Cookie</b> ”	means a small text file placed on your computer device by <b>our</b> Site when you visit certain parts of <b>our</b> Site and/ when you use certain features of <b>our</b> Site. Details of the Cookies used by <b>our</b> Site are set out in Part 14, below; and
“ <b>Cookie Law</b> ”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;]

### 2. Information About Us

**Our** Site is [owned and] operated by Gravity Cycles Ltd, a Limited Company registered in England under company number 11074990.

Registered address: 56 West Grove, Hersham, KT12 5NX.

Main trading address: 56 West Grove, Hersham, KT12 5NX.

Data Protection Officer: Bruce Karsten.

Email address: [bruce@gravitycycles.co.uk](mailto:bruce@gravitycycles.co.uk).

Telephone number: 01932688912.

Postal Address: 56 West Grove, Hersham, KT12 5NX.

We are regulated by ACT.

We are a member of Cytech, Association of Cycle Traders

### 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 and 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 General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, 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. **What Are My Rights?**

Under the GDPR, you have the following rights, which **We** will always work to uphold:

- a) The right to be informed about **our** collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact **us** to find out more to ask any questions using the details in Part 15.
- b) The right to access the personal data **We** hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by **us** is inaccurate incomplete. Please contact **us** using the details in Part 15 to find out me.
- d) The right to be forgotten, i.e. the right to ask **us** to delete otherwise dispose of any of your personal data that **We** have. Please contact **us** using the details in Part 15 to find out me.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to **us** using your personal data f a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to **us** directly, **We** am using it with your consent for the performance of a contract, and that data is processed using automated means, you can ask **us** f a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. **We** do not use your personal data in this way.

F me information about **our** use of your personal data exercising your rights as outlined above, please contact **us** using the details provided in Part 15.

Further information about your rights can also be obtained from the Information Commissioner’s Office your local Citizens Advice Bureau.

If you have any cause f complaint about **our** use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office.

## 6. What Data Do We Collect?

Depending upon your use of **our** Site, **We** may collect some or all of the following personal [and non-personal] data

- [Name;]
- [Date of birth;]
- [Gender;]
- [Address;]
- [Email address;]
- [Telephone number;]
- [Business name;]
- [Job title;]
- [Profession;]
- [Payment information;]
- [Information about your preferences and interests;]
- [IP address;]
- [Web browser type and version;]
- [Operating system;]
- [A list of URLs starting with a referring site, your activity on **our** Site, and the site you exit to;]

## 7. How Do You Use My Personal Data?

Under the GDPR, **We** must always have a lawful basis for using personal data. This may be because the data is necessary for **our** performance of a contract with you, because you have consented to **our** use of your personal data, because it is in **our** legitimate business interests to use it. Your personal data will may be used for [one of] the following purposes:

- [Providing and managing your Account;]
- [Providing and managing your access to **our** Site;]
- [Personalising and tailoring your experience on **our** Site;]
- [Supplying **our** products] and services to you. Your personal details are required in order for **us** to enter into a contract with you.]
- [Personalising and tailoring **our products** services] for you.]
- [Communicating with you. This may include responding to emails calls from you.]
- [Supplying you with information by [email] **AND/** [post] that you have opted-in to (you may unsubscribe or opt-out at any time by choosing an option on one of our mailing lists contacting the Data Protection Officer.)]
- [Analysing your use of **our** Site [and gathering feedback] to enable **us** to continually improve **our** Site and your user experience.]

[With your permission and/ where permitted by law, **We** may also use your personal data for marketing purposes, which may include contacting you by [email] **AND/** [telephone] **AND/** [text message] **AND/** [post] with information, news, and offers on **our** [products] **AND/** [services]. You will not be sent any unlawful marketing spam. **We** will always work to fully protect your rights and comply with **our** obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.]

Third Parties (including Yellow Jersey) whose content appears on **our** Site may use third-party Cookies, as detailed below in Part 14. Please refer to Part 14 for more information on controlling cookies. Please note that **We** do not control the activities of such third parties, nor the data that they collect and use themselves, and **We** advise you to check the privacy policies of any such third parties.

**[We** use the following automated system[s] for carrying out certain kinds of [decision-making] **AND/** [profiling]. If at any point you wish to query any action that **We** take on the basis of this wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the GDPR gives you the right to do so. Please contact **us** to find out more using the details in Part 15.

- The following automated decision-making method(s) may be used:
  - n/a.
  - n/a.]
- The following automated profiling may take place:
  - n/a.
  - n/a.]]

## 8. **How Long Will You Keep My Personal Data?**

**We** will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (, where there is no fixed period, the following facts will be used to determine how long it is kept):

- 12 months;

## 9. **How and Where Do You Store or Transfer My Personal Data?**

**We** will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

## 10. **Do You Share My Personal Data?**

**We** will not share any of your personal data with any third parties for any purposes, subject to one important exception.

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 complying with legal obligations, a court order, the instructions of a government authority.]

## 11. How Can I Control My Personal Data?

11.1 In addition to your rights under the GDPR, 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 and at the point of providing your details [and by managing your Account.

11.2 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.

## 12. Can I 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 allow for the collection of certain data.]

## 13. How Can I Access My Personal Data?

If you want to know what personal data **We** have about you, you can ask **us** for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email postal addresses shown in Part 15. [To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell **us** everything **We** need to know to respond to your request as quickly as possible.]

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded excessive’ (for example, if you make repetitive requests) a fee may be charged to cover **our** administrative costs in responding.

**We** will respond to your subject access request within 30 days and, in any case, not more than] one month of receiving it. Normally, **we** aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date **We** receive your request. You will be kept fully informed of **our** progress.

## 14. How Do You Use Cookies?

Our Site may place and access certain first-party Cookies on your computer 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** products and 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.

By using **our** Site, you may also receive certain third-party Cookies on your computer

device. Third-party Cookies are those placed by websites, services, and/ parties other than **us**. These Cookies are not integral to the functioning of **our** Site and your use and experience of **our** Site will not be impaired by refusing consent to them.

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

Before Cookies are placed on your computer device, you will be shown an information bar 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 as intended. [You will be given the opportunity to allow only first-party Cookies and block third-party Cookies.]

[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.]

**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 [products] **AND/** [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 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:

In addition to the controls that **We** provide, you can choose to enable/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 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 device if you are unsure about adjusting your privacy settings.]

## 15. **How Do I Contact You?**

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 Officer)]:

Email address: [bruce@gravitycycles.co.uk](mailto:bruce@gravitycycles.co.uk).

Telephone number: 01932688912.

Postal Address: 56 West Grove, Hersham, KT12 5NX.].

16. **Changes to this Privacy Policy**

**We** may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, if **We** change **our** business in a way that affects personal data protection.

Any changes will be immediately posted on **our** Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of **our** Site following the alterations. **We** recommend that you check this page regularly to keep up-to-date.