

# PRIVACY POLICY

Rod Mackenzie Ltd understands that your privacy is important to you and that you care about how your Personal Data is used and shared online. We respect and value the privacy of everyone who visits this website <https://rod-mackenzie.uk/> ("Our Site") and will only collect and use Personal Data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. It explains how We handle your Personal Data.

## 1. Definition and Interpretation

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

<b>"Data Protection Legislation"</b>	means all applicable legislation in force from time to time in the United Kingdom applicable to data protection and privacy including, but not limited to, the UK GDPR; the Data Protection Act 2018 (and regulations made thereunder); and the Privacy and Electronic Communications Regulations 2003 as amended;
<b>"Personal Data"</b>	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means Personal Data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the Data Protection Legislation; and
<b>"We/Us/Our"</b>	means Rod Mackenzie Ltd a company registered in England under company number 14142815 with a registered address of Castle Hill House, High Street, Huntingdon, Cambridgeshire, England, PE29 3TE.

## 2. Information About Us

Our Site <https://rod-mackenzie.uk/> is owned and/or operated by Us.

## 3. What Does This Policy Cover?

This Privacy Policy applies to any personal data shared with Us and 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. Your Rights

- a. As a data subject, you have the following rights under the Data Protection Legislation, which this Policy and Our use of Personal Data have been designed to uphold:
  - i. The right to be informed about Our collection and use of Personal Data;
  - ii. The right of access to the Personal Data We hold about you (see section 12);
  - iii. The right to rectification if any Personal Data We hold about you is inaccurate or incomplete (please contact Us using the details in section 13);
  - iv. The right to be forgotten – i.e., the right to ask Us to delete any Personal Data We hold about you (We only hold your Personal Data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 13);
  - v. The right to restrict (i.e., prevent) the processing of your Personal Data;
  - vi. The right to data portability (obtaining a copy of your Personal Data to re-use with another service or organisation);
  - vii. The right to object to Us using your Personal Data for particular purposes; and
  - viii. Rights with respect to automated decision making and profiling.
- b. If you have any cause for complaint about Our use of your Personal Data, please contact Us using the details provided in section 13 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.
- c. For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

## 5. 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 which may also include sensitive data and personal data relating to children:

Data Collected	How We Collect the Data
Identity information including full name	When you enquire about or use Our services
Contact information including home address, billing address, email address and contact telephone numbers – landline and/or mobile	When you enquire about or use Our services
Payment information including card details which are stored and processed anonymously by a third party payment processor	When you contract with Us and use Our services
Any other personal data that you provide to us via Our Website or by other electronic means	When you enquire about Our services
Children's data which will be stored securely, minimised to what is needed and anonymised where possible	When you use Our Services
Identity verification data such as passport, national insurance number or driving licence	When you contract with Us or sign up as an Associate to work with Us
Sensitive Personal Data	When We are instructed by Solicitors and Insurers and they share documents with Us that contain sensitive Personal Data

## 6. How Do We Use Your Data?

- a. We may collect and hold some or all the personal and non-personal data set out in the table below, using the methods also set out in the table. All Personal Data is processed and stored securely, for no longer than is necessary considering the reason(s) for which it was first collected. We will comply with Our obligations and always safeguard your rights under the Data Protection Legislation. For more details on security see section 7, below.

What We Do	What Data We Use	Our Lawful Basis
Administering our business	Identity information, contact information, and payment information	Fulfil a contract
Supplying our services to you	Identity, contact and payment information	Fulfil a contract
Managing payments for our services	Payment information	Fulfil a contract
Communicating with you	Identity and contact information	Legitimate interest
Providing and managing your Account	Identity and contact information	Fulfil a contract

- b. c. We may also use your data for the following purposes:
- Personalising and tailoring your experience on Our Site;
  - Supplying Our services to you (please note that We require your Personal Data in order to enter into a contract with you);
  - Personalising and tailoring Our services for you;
  - Replying to emails from you;
  - Market research;

- vi. Analysing your use of Our Site to enable Us to continually improve Our Site and your user experience; and
- vii. Where you have separately consented for marketing purposes.
- c. You have the right to withdraw your consent to Us using your Personal Data at any time, and to request that We delete it.
- d. We do not keep your Personal Data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):
  - i. We will retain your contact details for as long as we contract with you and for 72 months thereafter, with the exception of financial information as detailed in iv. below;
  - ii. We will retain your contact details for 12 months if you have enquired about our services thereafter, they will be deleted;
  - iii. We must keep some sensitive data for 25 years if mandated to do so by legislation or regulations; and
  - iv. We will retain your financial information, which could include your name, address and email address, for as long as we contract with you and, thereafter, for the permitted period of time required by law.

## **7. How and Where Do We Store Your Data?**

- a. We only keep your Personal Data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.
- b. We will store some of your Personal Data in the UK. This means that it will be fully protected under the UK's Data Protection Legislation.
- c. We will store some of your Personal Data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your Personal Data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfers of Personal Data to the EEA from the UK are permitted without additional safeguards.
- d. We may store some or all of your Personal Data in countries outside of the UK and EEA. These are known as "third countries". We will take additional steps in order to ensure that your Personal Data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.
- e. We use the following third-party software and some of your data may be stored on their servers:
  - i. Fasthosts Internet Limited (email provider); and
  - ii. iCloud.
- f. Steps We take to secure and protect your data include:
  - i. All devices and computers that we store your data on are password protected;
  - ii. All devices and computers that we store your data have anti-virus software and are constantly updated to the most recent operating system; and
  - iii. We only store your data on computers and devices owned by Us. We also use Contractors who may store Our data on their computers, servers and any such cloud storage they may access. We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.

## **8. Do We Share Your Data?**

- a. We may sometimes contract with third parties to supply products and services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.
- b. We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.
- c. We may sometimes use third party data processors that are located outside of the United Kingdom and European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein).

Where We transfer any Personal Data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK under the Data Protection Legislation including:

- i. Using Standard Contractual Clauses “SCCs” as a mechanism to safely process data outside of the UK and EEA to third countries which have not been granted adequacy; or
  - ii. Is a Country that has been granted adequacy which confirms its data protection legislation is adequate to safeguard data processing.
- d. In certain circumstances, We may be legally required to share certain data held by Us, which may include your Personal Data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

## **9. What Happens If Our Business Changes Hands?**

- a. We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any Personal Data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.
- b. In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.

## **10. How Can You Control Your Data?**

In addition to your rights under the Data Protection Legislation, set out in section 4, when you submit Personal Data via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our site of your data for direct marketing purposes (including the ability to opt-out if receiving emails from Us which you may do by subscribing using the links provided in Our emails and at the point of providing your details.

## **11. Your Right to Withhold Information**

You may access Our Site without providing any data at all.

## **12. How Can You Access Your Data?**

You have the right to ask for a copy of any of your Personal Data held by Us (where such data is held). Under the Data Protection Legislation, no fee is payable and We will provide any and all information in response to your reasonable request free of charge. Please contact Us for more details by using the contact details below in section 13.

## **13. Contacting Us**

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at [rod.mackenzie@me.com](mailto:rod.mackenzie@me.com) or by post to Us at Castle Hill House, High Street, Huntingdon, Cambridgeshire, England, PE29 3TE. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 11, above).

## **14. Changes to Our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site. This policy was last updated on **27<sup>th</sup> January 2025**