

Important information

This notice sets out your rights as a customer of Paul Stretton-Stephens or a member of his Reader Groups, or as a visitor to his website, under the new law.

This notice was last updated in 28th April 2018.

This privacy notice tells members and customers of Paul Stretton-Stephens what to expect when Paul Stretton-Stephens collects, uses, retains and discloses your personal information. Personal information is information that (on its own or together with other information) identifies you and is about you. This includes what you tell us about yourself and what we learn by having you as a member or customer.

Who I am

' www.pstretton-Stephens.com ' or 'Pen of Paul Media are trading names of Paul Stretton-Stephens. When we refer to www.pstretton-stephens.com or pen of Paul Media (or to 'we', 'us', or 'our'), we mean The Paul Stretton-Stephens

To ensure that we process your personal information fairly and lawfully, this notice informs you:

- Why we need your personal information;
- How it will be used;
- With whom it will be shared; and
- What rights you have in relation to the personal information we collect.

Within this notice we describe instances where Paul Stretton-Stephens is the 'data controller' (the organization who decides what personal information is collected and how it is used), and where we direct or commission the processing of personal information by third parties on our behalf to provide services or improve our offering to you.

There may be situations where Paul Stretton-Stephens processes data on the instructions of another organisation (known as acting as a 'data processor'), but in those circumstances our use of data would be governed by that organisation.

My commitment to your privacy

Paul Stretton-Stephens recognises the importance of protecting personal and confidential information in all that we do and takes care to meet our legal duties. Paul Stretton-Stephens puts in place all reasonable technical, security and procedural controls required to protect your personal information for the whole of its life, in whatever format that information is held.

How the law protects you

Your privacy is protected by law, which says that we can use your personal information only if we have a proper reason to do so. This includes sharing it outside of Paul Stretton-Stephens. The reasons why Paul Stretton-Stephens may process your personal information are:

- To fulfil a request by you for us to send you news, and promotional materials;
- When it is our legal duty;
- When it is in our legitimate interest; or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information, but this must not unfairly go against your rights or freedoms. If we rely on our legitimate interest, we will tell you what that is.

Below is a list of the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are. For further information in relation to the marketing that we undertake, please see the 'Marketing' section right.

WHAT WE USE YOUR PERSONAL INFORMATION FOR	OUR REASON(S) FOR PROCESSING	OUR LEGITIMATE INTERESTS (WHERE APPLICABLE)
<ul style="list-style-type: none">• To manage our relationship with you	<ul style="list-style-type: none">• Fulfilling obligations• Our legal duty• Your consent	<ul style="list-style-type: none">• Keeping our records up to date

WHAT WE USE YOUR PERSONAL INFORMATION FOR	OUR REASON(S) FOR PROCESSING	OUR LEGITIMATE INTERESTS (WHERE APPLICABLE)
<ul style="list-style-type: none"> • To communicate with you about your membership of a Reader Group or Paul Stretton-Stephens products you have purchased • To develop and carry out marketing activities • To conduct analysis and research activities to improve and develop our products and services • To analyse the reaction to our advertising activity • To create anonymised look-alike audiences for marketing purposes 	<ul style="list-style-type: none"> • Our legitimate interests 	<ul style="list-style-type: none"> • Working out which of our products and services may interest you and telling you about them • Defining audiences to market our products to • Seeking your consent when we need it to contact you • Being efficient about how we fulfil our legal and contractual duties

WHAT WE USE YOUR PERSONAL INFORMATION FOR	OUR REASON(S) FOR PROCESSING	OUR LEGITIMATE INTERESTS (WHERE APPLICABLE)
<ul style="list-style-type: none"> To provide you with the products/services we can offer when requested To manage how we work with other companies that provide services to us and my Reader Group members or customers 	<ul style="list-style-type: none"> Fulfilling contracts Our legal duty Our legitimate interests 	<ul style="list-style-type: none"> Being efficient about how we fulfil our legal and contractual duties
<ul style="list-style-type: none"> To administer payments relating to product sales To administer payments for services we can offer 	<ul style="list-style-type: none"> Fulfilling contracts Our legal duty Our legitimate interests 	<ul style="list-style-type: none"> Being efficient about how we fulfil our legal and contractual duties Complying with regulations that apply to us
<ul style="list-style-type: none"> To detect, investigate, 	<ul style="list-style-type: none"> Fulfilling contracts 	<ul style="list-style-type: none"> Developing and

WHAT WE USE YOUR PERSONAL INFORMATION FOR	OUR REASON(S) FOR PROCESSING	OUR LEGITIMATE INTERESTS (WHERE APPLICABLE)
<p>report and seek to prevent financial crime</p> <ul style="list-style-type: none"> To manage risk for us and our Reader Group members or customers To comply with regulations that apply to us To respond to complaints and seek to resolve them 	<ul style="list-style-type: none"> Our legal duty Our legitimate interests 	<p>improving how we deal with financial crime</p> <ul style="list-style-type: none"> Complying with regulations that apply to us Being efficient about how we fulfil our legal and contractual duties
<ul style="list-style-type: none"> To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate 	<ul style="list-style-type: none"> Our legal duty Our legitimate interests 	<ul style="list-style-type: none"> Complying with regulations that apply to us Being efficient about how we fulfil our legal and

WHAT WE USE YOUR PERSONAL INFORMATION FOR	OUR REASON(S) FOR PROCESSING	OUR LEGITIMATE INTERESTS (WHERE APPLICABLE)
governance and audit		contractual duties
<ul style="list-style-type: none"> To exercise our rights as set out in agreements or contracts 	<ul style="list-style-type: none"> Fulfilling contracts 	

What types of personal information do we handle?

We process personal information to enable us to run the pstretton-stephens.com website and Paul Stretton-Stephens, to support the provision of services to Reader Group members and customers, to maintain our own accounts and to promote our products.

The types of personal information we use include:

- Subscription requires first name and email.
- There may be occasions where more personal information is used such as names, addresses, telephone numbers, dates of birth;
- Employment details, work or profession details for individuals
- Financial details, including payments to Paul Stretton-Stephens by members and customers and payments made by Paul Stretton-Stephens for products or services provided to members and customers;
- Details of how you use our website, and where you have accessed it from;
- Details of how you interact with us on social media;
- Details of when you contact us and when we contact you (including voice recordings of telephone calls and copies of written communications such as emails or letters);

- Details of which Paul Stretton-Stephens' products you have purchased;
- Any consents which you have given us in relation to the processing of your information;
- Details of your use of services offered by Paul Stretton-Stephens .

Where we collect personal information from

We may collect your personal information from the following sources:

Personal information you give to us:

When you join Paul Stretton-Stephens Reader Groups ;

- When you contact Paul Stretton-Stephens (for example by phone, email or letter);
- In member or customer surveys or any other research activity we may conduct with you;
- When you use our services;

Personal information from third parties that we work with:

- When you buy a product from Paul Stretton-Stephens through a third party vendor
- Details obtained from online reviews
- Details obtained from social media;
- Details obtained from joint promotions i.e. newsletter swaps, blog tours etc.

If you choose not to give personal information

We may need to collect personal information by law, or under the terms of a contract we have with you.

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot provide you with a product or service which you have purchased from us. We will notify you if your choice not to give personal information to us would result in a delay or prevent us from meeting our obligations.

Any personal information that is optional will be clearly marked at the point of collection.

Who we share your personal information with

We may share your personal information between Paul Stretton-Stephens and selected companies that we use for dissemination of information and/or products to Reader Group Members and/or customers for these reasons:

- Assisting in verifying your identity;
- Assessing risks;
- Understanding your requirements;
- Developing, testing, researching and improving products and services
- Marketing products and services that we believe may be appropriate to you;
- Training and business analysis;
- Legal and regulatory compliance;
- Preventing or detecting financial crime;
- Complaints handling; or
- Improving customer service.

Certain services are provided by third party organisations who collect and use personal information in order to provide those services to you. They are known as our 'joint data controllers' under data protection law. This means that they have a separate responsibility to protect your personal information and will keep you informed about how your personal information will be used.

Your personal information will only be shared with third party organisations when required (for example for legal obligations or regulatory requirements, in respect of the products and/or services you request as a Reader Group member or customer of Paul Stretton-Stephens).

These types of organisations are:

- Mailing companies such as Mailchimp we work with to provide the services offered by Paul Stretton-Stephens;
- Facilitators of product distribution and/or promotion such as, but not exclusively, BookFunnel and Instafreebie that Paul Stretton-Stephens utilizes;
- HM Revenue & Customs, my regulators and other authorities, including fraud prevention agencies (where required or permitted by law).

In the usual course of our business, we may use other third party organisations known as 'data processors' under data protection law to support the essential

delivery of my products and services. These organisations process your personal information on our behalf.

These types of organisations are:

- Mailing, email, SMS messaging, and/or print fulfilment organisations (to enable us to communicate with you efficiently);
- Providers of business services such as auditors, consultants, solicitors and/or insurers (to enable us to run Paul Stretton-Stephens efficiently);
- Providers of records management services such as secure disposal suppliers, and IT storage providers (to enable us to secure data efficiently);
- Providers of IT systems or services (to enable us to run Paul Stretton-Stephens efficiently);
- Market researchers (to help us to improve the services we offer);
- Providers of information management services (to help us learn about our customers);

When we share your information with our approved third party providers, our contractual relationship with them prevents them from using your information for any other purpose outside of our instructions to them. They may use their own third party data processors, but are always required to meet the same legal requirements as Paul Stretton-Stephens does.

Paul Stretton-Stephens will never share or sell your information to external companies for their own marketing purposes.

Sending personal information outside of the EEA

Data protection law holds all countries in the European Economic Area ('EEA') to the same high standards. If we transfer information outside of the EEA, we will make sure that it is protected to these standards. We will only send your personal information to countries outside of the EEA to:

- Follow your instructions;
- Comply with a legal duty; or
- Work with other third party organisations (as detailed above) who we use to help provide my services to you.

We will always use one or more of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA;
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA; or
- Transfer it to organisations that subscribe to Privacy Shield. This is a framework that sets privacy standards for personal information sent between the US and EU countries.

Marketing

We may use your personal information to tell you about relevant products offered by Paul Stretton-Stephens (being Paul Stretton-Stephens; pstretton-stephens.com; Pen of Paul Media). This is what we mean when we talk about 'marketing'.

We can only use your personal information to send you marketing messages if we either have your consent or a 'legitimate interest'. Legitimate interest is when we have a business reason to use your information for marketing purposes (which will not unfairly go against your rights and freedoms). In other words, we will not market to you based on legitimate interest if you have told us that you do not want to receive such marketing or are registered on a preference services list.

We have a legitimate interest to:

- Send you marketing messages about Paul Stretton-Stephens products/services offered by Paul Stretton-Stephens (such as books, workshops and events) by post;
- Contact you via telephone to welcome you to Paul Stretton-Stephens; and
- Send you marketing messages by email or via social media about products offered by Paul Stretton-Stephens which are similar to those which you have already purchased from me (if you have provided us with an email address).

We will ask your explicit consent to send you any other marketing messages.

You can withdraw your consent or ask us to stop sending you any marketing messages at any time. If you want to do so, please contact us by:

- Following the unsubscribe link on the relevant email;
- Emailing info@pstretton-stephens.com

Tailoring products and services by automated systems

We may ask providers of information management services to use automated systems to place you in groups with similar members or customers, based upon your personal information. These are called customer segments. We use these to analyse our Reader Group member or customer needs, and to make decisions based on what we learn. This helps us to recruit new members and customers from different customer segments, and to show existing members or customers content and promotional material which may be of interest.

You have the right to ask that we do not use your personal information in this type of automated decision making. If you want to do so, please contact us by:

- Emailing info@pstretton-stephens.com

How long we keep your personal information

We will keep your personal information for as long as you are a Reader Group member or customer of Paul Stretton-Stephens .

After you stop being a member or customer:

- We may keep your personal information for up to 8 years for one of these reasons:
 - 1. To respond to questions or complaints;
 - 2. To show that we treated you fairly; or
 - 3. To maintain records according to legal requirements and documented business need.
- We may keep your personal information for longer than 8 years if we cannot delete it for legal, regulatory or technical reasons. In these circumstances, we will make sure that your privacy is protected and only use it for legal or regulatory purposes.

Your rights

In order to exercise your rights under data protection law, we will need to verify your identity for your security.

You can contact us by emailing info@pstretton-stephens.com

How to get a copy of your personal information

You can request a copy of your personal information, as well as why we have that personal information, who has access to that personal information and where we got that personal information from at any time. Once we have received your request we will respond within 30 days.

Letting us know if your personal information needs updating

You have the right to question any information we hold on you that you think is wrong, out of date or incomplete. If you do, we will take reasonable steps to check its accuracy and correct it.

If you need to update your contact details, you can do so by contacting us using the details above.

If you want us to stop using your personal information

You have the right to object to our use of your personal information, or to ask us to delete, remove or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and the 'right to erasure' (or 'right to be forgotten').

We may be able to restrict the use of your personal information so that it can only be used for certain things, such as legal claims or to exercise legal rights.

In this situation, we would not use or share your information in other ways while it is restricted.

You can ask us to restrict the use of your personal information if:

- It is not accurate;
- It has been used unlawfully but you don't want us to delete it;
- It is not relevant any more, but you want us to keep it for use in legal claims; or
- You have already asked us to stop using your personal information but you are waiting for me to assess your request and confirm whether we are permitted to continue using the personal information under data protection law.

If you want to object to how we use your personal information, or ask us to restrict how we use it, please contact us using the details above.

If you want us to erase your personal information

If you feel that we should no longer be using your personal information, or that we are illegally using your data, you can request that we erase the personal information we hold on you. When we receive your request, we will confirm whether the personal information has been deleted or tell you the reason why it cannot be deleted. There may be legal reasons why we need to keep your personal information.

If you want to request that we erase your personal information, please contact us using the details above.

Obtaining your personal information in a portable format

You have the right to get copies of your personal information from us in a format that can be easily re-used. You can also ask us to pass on your personal information to other organisations. To request this, please contact us using the details above.

Your right to complain

- If you are not satisfied with our response or believe that we are not processing your personal information in accordance with the law, you can complain to the Information Commissioner's Office (ICO)
- 1. By telephoning 0303 123 1113
- 2. or emailing [**casework@ico.org.uk**](mailto:casework@ico.org.uk)
- Additional contact methods are detailed on their website: [**https://ico.org.uk/global/contact-us.**](https://ico.org.uk/global/contact-us)

Changes to this privacy notice

We regularly review this privacy notice. We will publish any updates on the Paul Stretton-Stephens website and inform Reader Group members and customers of any changes within our regular communications. You can request a copy of our privacy notice by using the details above.

Contacting us

If you contact us

When you contact us, we will need to verify your identity for your security. Verifying identity is an important way of safeguarding against criminal activities including the prevention of illicit access to your information.

If we are unable to validate your identity, we may ask you to provide further evidence so that we can access your information.

Paul Stretton-Stephens reserves the right to discuss any financial transactions with the originating account holder.

Freedom of information

Paul Stretton-Stephens is not governed by the Freedom of Information Act as neither Paul Stretton-Stephens nor any of its trading names are a public authority.

How to contact our data protection officer

If you have any questions about this privacy notice or our processing of information, if you wish to raise a complaint on how we have handled your personal information, or if you wish to exercise any of the rights set out in this privacy notice, please contact us by emailing info@pstretton-stephens.com

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Affiliation Disclosure

I, Paul Stretton-Stephens, owner of pstretton-stephens.com may earn, at no additional costs to you, commissions as an affiliate marketer for recommending products/services on this website (incl. blog), I hope that this disclosure will demonstrate my intent to run an honest and reputable enterprise.

For more information, please visit www.affiliatedisclosure.com/help.php