

## **Privacy Statement**

Last updated: 23/10/2024

Here at New Eleusis, we are committed to protecting your privacy and personal data. This Statement sets out the basis upon which we process any personal data collected from you, or that you provide to us, or that we acquire through a third-party. It applies to users of our website and those who decide to contact us through any of our designated channels. Please read the following Statement carefully to better understand our practices concerning your personal data and how we will treat it.

Before we process your personal data, however, we are obliged to inform you of who we are as a company, why we need to process your personal data, the type of information we collect, what we will do with such data, and to whom this data will be passed on to. It is important that the data we hold about you is current and accurate, and you are advised to keep us informed of any changes during our relationship.

New Eleusis is a business trading under the legal company name of Matcon Productions Limited, registered in England and Wales (No. 07645226) and whose office is 36 Shakespeare Road, Droylsden, Manchester, M43 7NF.

If you have any questions regarding this Privacy Statement or any of our data protection policies in general, please contact us either by post at New Eleusis, 10 Darlington Road, Richmond, North Yorkshire, DL10 7AW; or by email: [contact@neweleusis.uk](mailto:contact@neweleusis.uk).

### **1. Definitions**

In this privacy policy, the following definitions are used:

#### **1.1. Data**

Collectively all information that You submit to New Eleusis. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws.

#### **1.2. Data Protection Laws**

Any applicable law relating to the processing of personal Data, including but not limited to the Directive 96/46/EC (Data Protection Directive) or the GDPR, and any national

implementing laws, regulations and secondary legislation, for as long as the GDPR is effective in the UK.

## **2. General**

- 2.1. For purposes of the applicable Data Protection Laws, New Eleusis is the 'data controller'. This means that New Eleusis determines the purposes for which, and the manner in which, any Data is processed.
- 2.2. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.
- 2.3. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.
- 2.4. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.
- 2.5. This Privacy Statement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

## **3. The type of personal information we collect**

When we process your personal data, we do so on the basis of an interest in pursuing legitimate business aims and objectives, or to comply with any binding legal obligations (such as protecting the rights, property and safety of our staff, customers, and others); but also to establish, exercise and/or defend our legal rights. We currently collect and process the following information:

- Personal identifiers, contacts and characteristics (for example, name and contact details)

Telephone – when you contact us, we will collect your name and telephone number, alongside any other relevant details or information relating to a contract for products or services.

Email – when you email us, we will collect your name, e-mail address and the contents of your message and any attachments. When you fill out any of our contact forms, we may collect your name, email and property address (if your query is such that we need to know where you are located), and your phone number (if we need to contact you to discuss your query in more detail).

Post – if you send us a letter or other correspondence by post, we may collect any personal data contained therein.

- Due to the nature of our business we do not anticipate collecting of data from children.

#### **4. How we get this personal information and why we have it**

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

(a) Your consent; which you are able to remove at any time and can do so by emailing [contact@neweleusis.uk](mailto:contact@neweleusis.uk).

(b) We have a contractual obligation

(c) We have a legal obligation

(d) We have a vital interest

(e) We need it to perform a public task

(f) We have a legitimate interest

When we process your personal data for the above purposes, we do so on the basis that such processing is necessary for compliance with a legal obligation to which we are subject or necessary in order to protect the vital interests of a natural person, respectively or necessary in order to pursue our business interests in exercising our legal rights.

Most of the personal information we process is provided by you for one of the following reasons:

- In order to process orders.
- Into order to handle any enquiries, including addressing any complaints. In order to provide our services to you.

- In order to monitor e-mails and other electronic messages for security reasons. We use e-mail monitoring or blocking software (spam filters).
- In order to improve our internal processes, including staff training and quality control. Put simply, if we know how and why you are using our Service, we can make sure we're providing you with the best possible experience.

We collect Data in the following ways: a) data is given to us by you.

a) Data that is given to us by you

New Eleusis will collect your Data in a number of ways, for example:

- when you contact us by telephone, post, e-mail or through any other means;
- when you book with us and set up an account to receive our products/services;
- when you complete surveys that we use for research purposes (although you are not obliged to respond to them);
- when you enter a competition or promotion through a social media channel;
- when you make payments to us;
- when you elect to receive marketing communications from us;
- when you use our services; in each case, in accordance with this Privacy Statement.

## **5. Our use of Data**

Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience. Specifically, Data may be used by us for the following reasons:

- internal record keeping;
- improvement of our products/services;
- transmission by email of marketing materials that may be of interest to you;
- contact for market research purposes which may be done using email, telephone, fax or mail. Such information may be used to customise or update the Website; in each case, in accordance with this Privacy Statement.

## **6. Who we share Data with**

We may share your Data with the following groups of people for the following reasons:

- our employees, agents and/or professional advisors - to obtain advice from professional advisers; in each case, in accordance with this Privacy Statement.

## **7. Keeping Data secure**

We will use technical and organisational measures to safeguard your Data, for example, we store your Data on secure servers. Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via this e-mail address: [contact@neweleusis.uk](mailto:contact@neweleusis.uk).

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

New Eleusis 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 the Company. Data provided by Users will, where it is relevant to any part of our business so 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 the Data for the purposes for which it was originally supplied to us. We may also disclose Data to a prospective purchaser of our business or any part of it.

In the above instances, we will take steps with the aim of ensuring your privacy is protected.

## **8. Marketing**

If you are an individual consumer, we will only provide you with direct marketing communications where you have consented to receive such communications or you have contacted us directly to request specific information about our products and services. You can subscribe to such marketing communications, and you can adjust your marketing preferences at any time by emailing us at [contact@neweleusis.uk](mailto:contact@neweleusis.uk).

If you represent another business, we may provide you with direct marketing communications where we feel that this may be relevant to your business (provided that you have not opted out of such communications). When we use your personal data for such purposes, we do so on the basis that it is in our business interests to pursue direct

marketing, provided that it constitutes fair processing of your personal data to do so. You can also opt-out or unsubscribe from all or some of these marketing communications at any time by emailing us at [contact@neweleusis.uk](mailto:contact@neweleusis.uk).

Where you opt out of receiving these marketing communications, this opt-out will not apply to personal data provided to us for any other purpose (for example your personal data which we require to carry out a contract with you).

## **9. Third-Parties**

We may use third-parties to develop or provide our services, and these third-parties will have access to your personal data that we store. Such third-parties are data processors and will only process your personal data on our instructions and subject to obligations of confidentiality. Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third-parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

We also use social media buttons and/or plugins on this site that allow you to connect with your social network in various ways. For these to work the following social media sites including Facebook and Instagram, will set cookies through our site which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

### **JOBBER**

We use Jobber for our business activities and prioritising customer service. This includes accepting requests, creating quotes, scheduling bookings and generating invoices, which may require your personal details.

### **REVOLUT BUSINESS**

We use Revolut banking to conduct our financial affairs and take payments by card and bank transfer, which collects your full name and card details for the purposes of transactions and issuing receipts.

### **GOCARDLESS**

We currently provide our regular services through a Direct Debit scheme issued by GoCardless, which collects your full name and card details for the purposes of transactions and issuing receipts.

#### MAILCHIMP

We may use Mailchimp for marketing and communications, which collects your full name, email address, IP address and information otherwise customised based on your selected preferences. We do not transfer personal data outside of the European Economic Area (EEA) except with regard to customer information which is processed and held by Mailchimp, who ensure that appropriate safeguards are put in place to protect such transfers. Where you use the Application in a country outside the EEA, your personal data will be transferred to and processed in the country from where you have accessed it. You acknowledge and agree that such a transfer of your personal data out with the EEA is entirely your responsibility.

#### WEBAHEAD

Webahead is the company we use to develop and support our website and do not collect data directly, but have access to our databases for the purposes of internal development and maintenance only.

#### GOOGLE ANALYTICS

This site uses Google Analytics which is one of the most widespread and trusted analytics solutions on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content. For more information on Google Analytics cookies, see the official Google Analytics page.

#### FACEBOOK/INSTAGRAM/PINTEREST/WHATSAPP

We use Facebook, Instagram, Pinterest and WhatsApp for marketing and communication purposes, and collect enquiry data that you supply such as your name, email and property details.

### **10. How we store your personal information**

Your information is securely stored. We have put in place appropriate measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to only named

employees, agents, contractors and other third-parties who have a legitimate need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

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.

Unless a longer retention period is required or permitted by law, we will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this Privacy Statement until you request that the Data be deleted. Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.

All users of our products and services are able to close the accounts they have with us by emailing [contact@neweleusis.uk](mailto:contact@neweleusis.uk). When we receive a request from you to close your account we will delete all of the personal data we hold on our products and services but we may retain limited personal data. We may retain personal information relating to your initial purchase of our products and services.

## **11. Your data protection rights**

We may use your Data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances. Under data protection law, you have rights including:

Your right of access (commonly known as a 'data subject access request') – You have the right to ask us for copies of your personal information. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information

we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.

Your right to rectification – You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. the right to have your Data rectified if it is inaccurate or incomplete.

Your right to erasure – You have the right to ask us to erase your personal information in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. The right to request that we delete or remove your Data from our systems.

Your right to restriction of processing – You have the right to ask us to restrict the processing of your personal information in certain circumstances. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it. the right to "block" us from using your Data or limit the way in which we can use it.

Your right to object to processing – You have the right to object to the processing of your personal information in certain circumstances. Where we are relying on a business 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are

processing your personal data for direct marketing purposes. the right to object to our use of your Data including where we use it for our legitimate interests.

Your right to data portability – You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. the right to request that we move, copy or transfer your Data.

You may withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

You are not required to pay any charge for exercising your 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. You also have the right to complain to the Information Commissioner’s Office (ICO), which regulates the processing of personal data, about how we are processing your personal data.

Please email us at [contact@neweleusis.uk](mailto:contact@neweleusis.uk) if you wish to make a request. We have one month to respond.

## 12. Complaints

If you have any concerns about our use of your personal information, you can register a complaint with us by emailing us at [contact@neweleusis.uk](mailto:contact@neweleusis.uk). To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via email.

If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection

authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at <https://ico.org.uk/>.

You can also register a complaint with the Information Commissioner's Office (ICO) if you are still unhappy with how we have used your data:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

New Eleusis reserves the right to change this Privacy Statement as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the Privacy Statement on your first use of the Website following the alterations. You are therefore advised to re-read this document on a regular basis. Please note that these notifications are legally-bound and that New Eleusis may provide copies of such notices to the participants in the dispute or to third parties, at its discretion or as required by law. The Privacy Statement does not protect information provided in this Statement.