



# Privacy Policy

## BACKGROUND:

Pax Animi Investigation Services Limited 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 all our customers 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 website, and you will be required to read and accept the Privacy Policy when signing up for an account. If you do not accept and agree with the Privacy Policy, you must stop using our site immediately.

## 1. Information About Us

Pax Animi Investigation Services Limited are registered in the United Kingdom under company number 12358529.

**Registered address:** 71-75 Shelton Street, Covent Garden, London. WC2H 9JQ.

**VAT number:** 338 7888 36

**Email address:** [Info@pax-animi.co.uk](mailto:Info@pax-animi.co.uk)

**Telephone number:** 0121 270 7504 **-OR-** 020 859 4240

**Postal Address:** Suite 2a Blackthorn House, St Paul's Square, Birmingham. B3 1RL.

## 2. Definitions and Interpretation

In this policy the following terms shall have the following meaning

**“Account”** Means an account required to access and/or use certain areas and features or our site.

**“Cookie”** Means a small text file placed on your computer or device by our own site when you visit certain parts of our site and/or when you use certain features of our site.

**“Cookie Law”** Means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003.

### 3. **What Does This Notice Cover?**

This Privacy Policy explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

### 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.

The personal data that we use is set out in Part 5, below.

### 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 Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 13.
- 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 or incomplete. Please contact us using the details in Part 13 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 13 to find out more.
- 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 for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of

a contract, and that data is processed using automated means, you can ask us for 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. Part 6 explains more about how we use your personal data, including automated decision-making **AND/OR** profiling.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 13.

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

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. The ICO can be contacted at <https://ico.org.uk>

## 6. **What Personal Data Do You Collect?**

When you purchase goods and services from us, we are entering into a contract with you, therefore we will collect some or all the following personal and non-personal data from you (this may vary according to your relationship with us):

- Name, Address, Date of Birth, Gender, E-mail address, Telephone numbers, Business name, Company information, Job title, Profession, Payment information, Bank Account Details, Information about your preferences and interests. We may also collect;
- Your web browser type and version
- Your devices operating system
- A list of URLs starting with a referral site, your activity on our site, and the site you exit to;

This is statistical data about our users browsing actions and patterns and does not identify any individual.

For some of our products and services we will also hold personal data about third party individuals i.e. those subject to lawful investigation in line with a Lawful Basis:

- Photographs of individuals
- Vehicle make, model, colour and registration.
- Personal data as detailed above.

## 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, or because it is in our legitimate business interests to use it. Your personal data will/may be used for one of the following purposes:

- We will use your personal data to enable us to supply our products and services to you. Your personal details are required for us to enter a legal contract with you.
- We will use your personal data to enable us to receive products and services from you. Your personal details are required for us to enter a legal contract with you.
- Providing and managing your Account, including whenever you report a problem, make an enquiry about our product and services, or make a complaint
- Providing and managing your access to our Web Site,
- Personalising and tailoring our products and services for you.
- Personalising and tailoring your experience on our Site, i.e. details of your visits including, but not limited to, session duration, traffic data, and location data.
- Communicating with you. We may record communications with you, i.e. e-mails **AND/OR** calls for the purpose of order fulfilment and fraud prevention. This may include responding to emails **AND/OR** calls from you.
- Supplying you with information by e-mail **AND/OR** post that you have opted-in to (you may unsubscribe or opt-out at any time by contacting the company at [info@pax-animi.co.uk](mailto:info@pax-animi.co.uk))

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 e-mail **AND/OR** telephone **AND/OR** text message **AND/OR** post with information, news, and offers on our products **AND/OR** 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 GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

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

We will not keep your personal data for any longer than is necessary considering the reason(s) for which it was first collected. Your personal data will therefore be kept for as long as required to provide you with the goods and services purchased from us, OR, for the goods and services we have received from you and in line with our legal requirements.

## 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.

The security of your personal data is essential to us, and to protect your data, we take several important measures, including the following:

- Password protection
- Encryption
- Anti-virus and firewall security
- Regular back ups
- Restricted access

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

We may sometimes contract with the following third parties to supply products **AND/OR** services to you on our behalf. These may include payment processing, delivery, and marketing. In some cases, those third parties may require access to some or all your personal data that we hold.

- These may include third parties during any current investigation.
- I.T professionals that host our website for us.
- Our employees for the purpose of facilitating products and services to you.
- We will never share your personal data with third parties for marketing purposes without first obtaining your express consent.
- We will never transfer your personal data outside of the European Economic Area EEA.

If any of your personal data is required by 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 8.

If any personal data is transferred outside of the EEA, we will take suitable 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 GDPR, as explained above in Part 9.

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.

## 11. **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 or postal addresses shown in Part 13. 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 or 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 one month 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.

## 12. **How Do You 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 products **AND/OR** services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is

always protected and respected.

By using Our Site, you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us. Third-party Cookies are used on Our Site. For more details, please refer to the table below. 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 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. 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. 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/OR** 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.

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 website 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.

### 13. **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:

**Email address:** [privacy@pax-animi.co.uk](mailto:privacy@pax-animi.co.uk)

**Telephone number:** 0121 270 7504 **-OR-** 020 859 4240

**Postal Address:** Pax Animi Investigation Services: Suite 2a Blackthorn House, St Paul's Square, Birmingham. B3 1RL.

### 14. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or 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.