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## PRIVACY POLICY

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### BACKGROUND:

Michelle Ramsay Design Limited - The Fashion Expert® understands that your privacy is important to you and that you care about how your personal data is used. I respect and value the privacy of everyone who visits this website, [www.thefashionexpert.com](http://www.thefashionexpert.com) ("My Site") and will only collect and use personal data in ways that are described here, and in a way that is consistent with My 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 requested.

### 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/or use certain areas and features of My Site;
<b>"Cookie"</b>	means a small text file placed on your computer or device by My Site when you visit certain parts of My Site and/or when you use certain features of My Site. Details of the Cookies used by My 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 Me

My Site is owned and operated by Michelle Ramsay Design Ltd –The Fashion Expert®, a limited company registered in England under company number 11252084.

Registered address: 10 Stadium Court, Stadium Road, Wirral, Bromborough, CH62 3RP.

Email address: [info@thefashionexpert.com](mailto:info@thefashionexpert.com).

Telephone number: +44 (0) 7528 659 583.

### 3. What Does This Policy Cover?

This Privacy Policy applies only to your use of My Site. My Site may contain links to other websites. Please note that I have no control over how your data is collected, stored, or used by other websites and I 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") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") 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 Data Protection Legislation, you have the following rights, which I will always work to uphold:

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

For more information about My use of your personal data or exercising your rights as outlined above, please contact Me using the details provided in Part 15.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data I hold about you changes, please keep Me informed as long as I have that data.

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 My use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office. I would welcome the opportunity to resolve your concerns myself, however, so please contact Me first, using the details in Part 15.

## 6. What Data Do You Collect and How?

Depending upon your use of My Site, I may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. Please also see Part 14 for more information about My use of Cookies and similar technologies. I do not collect any 'special category' or 'sensitive' personal data personal data relating to children or data relating to criminal convictions and/or offences.

<b>Data Collected</b>	<b>How I Collect the Data</b>
Identity Information including Name.	Collected during the order process, via the contact form, creation of account on website or sign up to email newsletter
Contact information including address, email address, phone number.	Collected during the order process, via the contact form, creation of account on website or sign up to email newsletter
Business information including business name, business address, business billing address, phone number, email.	Collected during the order process or via the contact form.
Business details – information about your business, design briefs, technical details of designs	Collected during consultation or carrying out work.
Payment information including Order numbers, payment methods.	Collected during the order process.
Technical information including Logins details, IP address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.	IP is necessary for our legitimate interests (for running our business, provision of administration and IT services, network security & to prevent fraud).

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

Under the Data Protection Legislation, I must always have a lawful basis for using personal data. The following table describes how I may use your personal data, and My lawful bases for doing so:

<b>What I Do</b>	<b>What Data I Use</b>	<b>My Lawful Basis</b>
Providing and managing your Account.	Technical data. Identity & Contact data	Contractual requirement & Consent.
Providing and managing your access to My Site.	Technical data. Identity & Contact data	Contractual requirement & Consent.
Administering My Site.	Technical data. Identity & Contact data.	Contractual requirement & Consent.
Administering My business.	Technical data. Identity, Contact data, business	Contractual requirement.

	information, business details, payment details.	
Supplying My products and services to you.	Identity, Contact data, business information, business details, payment details, technical details.	Contractual requirement.
Managing payments for My products and services.	Technical data. Identity, Contact data, payment details..	Contractual requirement.
Personalising and tailoring My products and services for you.	Technical data. Identity, Contact data, business information, business details, payment details.	Contractual requirement
Communicating with you.	Identity and Contact data.	Contractual requirement for orders. Contact form – Consent.
Supplying you with information by email that you have opted-in-to (you may opt-out at any time by clicking unsubscribe link on every email.	Identity and Contact data.	Consent.

With your permission and/or where permitted by law, I may also use your personal data for marketing purposes, which may include contacting you by email with information, news, and offers on My products or services. You will not be sent any unlawful marketing or spam. I will always work to fully protect your rights and comply with My obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

Third Parties (including Instagram) whose content appears on My 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 I do not control the activities of such third parties, nor the data that they collect and use themselves, and I advise you to check the privacy policies of any such third parties.

I will only use your personal data for the purpose(s) for which it was originally collected unless I reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If I do use your personal data in this way and you wish Me to explain how the new purpose is compatible with the original, please contact Me using the details in Part 15.

If I need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, I will inform you and explain the legal basis which allows Me to do so.

In some circumstances, where permitted or required by law, I may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

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

I 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 (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long I Keep It
Identity Information including title, first name & last name.	7 Years in Accordance with UK tax law.
Contact information including address, email address, phone number.	7 Years in Accordance with UK tax law.
Business information including business name, business address, business billing address, phone number, email. Designs	7 Years in Accordance with UK tax law.
Payment information including invoicing.	7 Years in Accordance with UK tax law.
Account information including Username, Password, for access to The Fashion Expert Academy courses.	Until you request account closure.
Technical information including Logins details, IP address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.	Technical use of site Up to 2yrs. Site logins until you request account closure)
Newsletter.	Until you request to unsubscribe.

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

I will only store or transfer most of your personal data within the UK. This means that it will be fully protected under the Data Protection Legislation.

If your data is shared/stored/transferred with external third parties, as detailed below in Part 10, that are based outside of the EEA. The following safeguards are applied to such transfers:

I use specific contracts with external third parties that are approved by the European Commission for the transfer of personal data to third countries. These contracts require the same levels of personal data protection that would apply under the Data Protection Legislation. More information is available from the [European Commission](#).]

AND

Where I transfer your data to a third party based in the US, the data may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar to those in Europe. More information is available from the [European Commission](#).

Please contact Me using the details below in Part 15 for further information about the particular data protection mechanisms used by Me when transferring your personal data to a third country.

The security of your personal data is essential to Me, and to protect your data, I take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where I am legally required to do so.

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

I will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

In some limited circumstances, I may be legally required to share certain personal data, which might include yours, if I am involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

<b>Recipient</b>	<b>Activity Carried Out</b>
Accounting Software.	Records of invoicing and payments.
Newsletter providers	To send out marketing email and information regarding courses
Website Hosting	Has access to details entered during order process or setting up access for courses.

If any of your personal data is shared with a third party, as described above, I will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, My obligations, and the third party's obligations under the law, as described above in Part 9.

If any personal data is transferred outside of the EEA, I 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 Data Protection Legislation, as explained above in Part 9.

If I sell, transfer, or merge parts of My business or assets, your personal data may be transferred to a third party. Any new owner of My business may continue to use your personal data in the same way(s) that I have used it, as specified in this Privacy Policy.

In some limited circumstances, I may be legally required to share certain personal data, which might include yours, if I am involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

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

11.1 In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via My Site, you may be given options to restrict My use of your personal data. In particular, I aim to give you strong controls on My use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Me which you may do by unsubscribing using the links provided in My emails.

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 My Site without providing any personal data at all. However, to use all features and functions available on My Site, or to access courses or make purchases online, you will be required to submit or allow for the collection of certain data.

You may restrict My use of Cookies. For more information, see Part 14.

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

If you want to know what personal data I have about you, you can ask Me 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 15.

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 My administrative costs in responding.

I will respond to your subject access request within a week and, in any case, not more than one month of receiving it. Normally, I 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 I receive your request. You will be kept fully informed of My progress.

## 14. **How Do You Use Cookies?**

My Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by Me and are used only by Me. I use Cookies to facilitate and improve your experience of My Site and to provide and improve My products and services. I 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 My 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 Me. Third-party Cookies are used on My Site for to assist with marketing and advertising. For more details, please refer to the table below. These Cookies are not integral to the functioning of My Site and your use and experience of My Site will not be impaired by refusing consent to them.

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

Before Cookies are placed on your computer or device, you will be shown a cookie banner requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Me 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 My Site may not function fully or as intended.

Certain features of My 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 My Site may not work properly if you do so. I have taken great care to ensure that your privacy is not at risk by allowing them.

The following first-party Cookies may be placed on your computer or device:

<b>Name of Cookie</b>	<b>Purpose</b>	<b>Strictly Necessary</b>	<b>Expiry</b>
<b>_abck</b>	<b>Used to detect and defend against replay-cookie-attacks – The cookie is necessary for the security and integrity of the website.</b>	Yes	1 year
<b>AWSALB, AWSALBCORS, bSession</b>	<b>Registers which server-cluster is serving the visitor. This is used in con text with load balancing, in order to optimize user experience</b>	Yes	1 day 6 days 1 day
<b>bm_sz</b>	<b>Used in context with the website's BotMan ager. The BotMan ager detects, categorizes and compiles reports on potential bots trying to access the website.</b>	Yes	1 day
<b>hs</b>	<b>Ensures visitor browsing-security by preventing cross-site request forgery. This cookie is essential for the security of the website and visitor</b>	Yes	Session
<b>JSESSIONID</b>	<b>Preserves users states across page requests.</b>	Yes	Session



<b>ssr-caching TS#</b>	<b>This cookie is necessary for the cache function. A cache is used by the website to optimize the response time between the visitor and the website. The cache is usually stored on the visitor's browser.</b>	Yes	1 day
<b>XSRF-TOKEN</b>	<b>Ensures visitor browsing-security by preventing cross-site request forgery. This cookie is essential for the security of the website and visitor.</b>	Yes	Session

and the following third-party Cookies may be placed on your computer or device:

<b>Name of Cookie</b>	<b>Provider</b>	<b>Purpose</b>	<b>Expiry</b>
_ga _gid	Google Analytics	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	2 years 1 day
_gat	Google Analytics	Used by Google Analytics to throttle request rate	1 Day
fedops.logg er.sessionId	Wix.com	Registers statistical data on users' behaviour on the website.	Persistent
jserrors/1/#	Facebook	Pixel Tracker	Session
_fbp	Facebook	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.	3 months
_mcid	Mailchimp	This cookie registers data on the visitor. The information is used to optimize advertisement relevance.	1 day
ec	Facebook	Registers data on visitors from multiple visits and on multiple websites. This information is used to measure the efficiency of advertisement on websites.	Session
fed	Wix.com	This cookie is used to collect information on the visitor's behaviour. This information will be stored for internal use on the website – internal analytics is used to optimize the websites or to register if the visitor has subscribed to a newsletter.	Session
Fr tr events/1/c99 d7f1ab0 events/1/#	Facebook	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.	3 months Session Session Session

<b>svSession</b>	Wix.com	<b>Tracks a visitor across all wix.com sites. The information collected can be used to make advertisement more relevant for the visitor.</b>	2yrs
<b>Wixlabs-ugc</b>	Wix.com	<b>Session Storage to Access Session Variable created by Custom Javascript</b>	Session

In addition to the controls that I 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.

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

To contact Me 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 Michelle Ramsay):

Email address: [info@thefashionexpert.com](mailto:info@thefashionexpert.com).

Telephone number: +44 (0) 7528 659 583.

Registered company address 10 Stadium Court, Stadium Road, Wirral, Bromborough, CH62 3RP

#### 16. **Changes to this Privacy Policy**

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

Any changes will be immediately posted on My Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of My Site following the alterations. I recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 29/1/2021.