Privacy Policy for WiseOwlHR

**Our commitment and beliefs**

* We are committed to protecting your privacy and personal data
* We will only collect and process your data when necessary
* We will never sell, rent or distribute or make public your personal data
* You have the right to request from us details about how we hold your data, and update your preferences at any time
* For the purposes of this Policy, “we” or “us” refers to WiseOwlHR, part of [AdviserPlus Business Solutions Ltd](#_Data_controller), the data controller.

The WiseOwlHR.com website is designed to comply with the EU General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) that is effective from May 2018, and other related legislation.

**Information Collected and How It is used**

How we collect your personal information is detailed below, covering our use of [cookies and website tracking](#_Site_visitor_tracking), and [data capture forms](#_Data_capture).

The information we collect will be used to:

* provide you with the information, products or services that you sign up to;
* carry out our obligations to you as a client for contractual purposes;
* notify you about any changes to our services that affect you as a client;
* provide you with information that you have consented to be contacted about;
* ensure that content from our website is presented correctly;

If any information you provide to us changes, please update via the links provided in the data capture section and we will correct, update or remove any information that we hold about you. We may however need to retain archive copies of that information for legal purposes, such as to defend a legal claim or for audit purposes, such as to monitor marketing preferences and decisions.

WiseOwlHR has a legitimate interest in processing personal data when marketing its services to other businesses that is has identified has having an interest in, or benefiting from, our services. The individual contacted via marketing communications can update their preferences or opt-out at any time and WiseOwlHR will update or remove the data record as appropriate.

**Site visitor tracking & cookies**

Like most websites, this site tracks user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to see their journey through the website.

We use tools including Google Analytics (GA), which although it records data such as your geographical location, device, internet browser and operating system, none of this information identifies you to us. GA also records your computer’s IP address which could be used to identify you, but Google do not grant us access to this.

Disabling cookies on your internet browser will stop GA from tracking any part of your visit to pages within this website.

We also make use of other cookies, to distinguish you from other users. The different cookies we use:

| Cookie | Cookie Name | Purpose | Duration |
| --- | --- | --- | --- |
| Google Analytics | PREF, \_\_utma, \_\_utmb, \_\_utmc, \_\_utmv, \_\_utmz , SID, \_ga,\_gat,\_gid | Providing visitor numbers, demographics ad site navigation. [Click here for more on GA cookies](https://www.google.co.uk/intl/en/policies/privacy/). |  |
| Clickfunnels | cf:cf\_affiliate\_id, cf:cf\_affiliate\_id  cf:content, cf:medium, cf:name,  cf:name, cf:source, cf:term, \_viewed\_ | Used as part of our Affiliate program to track referrals, Internal tracking cookie that tracks users movement through the site. No personal information is captured and all information is kept internal to Clickfunnels, Internal tracking cookie to determine if a browser has visited a page before | Persists for 1 year |
| Clickfunnels | is\_eu, Garlic: (various values) | This cookie is set by our content delivery network to identify users in EU member states for GDPR purposes,  Cookie used to pre-populate form fields for visitors | Persists without expiration |
| Clickfunnels | cf\_uvid | Used to differentiate between a new user and a returning user | Persists for 3 months |
| Clickfunnels | \_\_Stripe\_mid, \_\_Stripe\_sid | Session cookie for Stripe payment platform | Persists for 1 year after logout |
| Clickfunnels | \_\_cfduid | Validates the user has passed security checks to avoid asking them again | Persists without expiration |
| Clickfunnels | addevent\_track\_cookie | Allows users to add an invite for an event to their calendars from the page | Session |

\*We do not have control over the cookies deployed by Google. We need to accept them to take advantages of the services Google provides, which we believe to be of value to our visitors - their privacy policy which governs their use of cookies can be found [here](https://www.google.co.uk/intl/en/policies/privacy/).

**Can I block cookies?**

You can block cookies by activating the settings on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our site. Unless you have adjusted your browser settings to refuse cookies, our system will issue cookies as soon you visit our site.

For further information about cookies visit <https://www.aboutcookies.org/> or

<http://www.allaboutcookies.org/>

**When will the cookies expire?**

Except for essential cookies, all cookies will expire after a time period of between 30 minutes and for the durations detailed in the table above.

**Data capture**

If you choose to complete our website contact form, enquiring about our services, this information will be sent to our CRM platform HubSpot Sales and an email notification sent to [support@wiseowlhr.com](mailto:support@wiseowlhr.com), which is accessed by our sales team for processing your enquiry. We will store your information for the purpose of your enquiry and to contact you in the future if we believe our other services, resources or business updates will be of interest.

For sales and marketing purposes we may collect the following personal data - your name, job title, your company name, company address, business email address, telephone number and your areas of interest where this is provided.

If you would like to change how we process your information for marketing purposes, you can update your preferences or opt-out at any time [by](http://info.adviserplus.com/unsubscribe) emailing [support@wiseowlhr.com](mailto:support@wiseowlhr.com).

We will hold your data for as long as you are happy for us to hold your data, and will engage with you regularly to check you are happy to be kept informed.

**External website links**

From time to time we may contain links to and from other websites. If you follow a link to another website, please note that the website in question will adhere to its own privacy policy and we do not accept any responsibility or liability arising from their policy, or from your use of their website. You should always check the website’s privacy policy before submitting any information to it.

**Third party data sub processors**

We use third parties to process data on our behalf these are noted below. These third parties are subject to change:

| Third Party | Purpose of holding data |
| --- | --- |
| Google | For website traffic monitoring & analytics reporting  For more on Google & GDPR click [here.](https://policies.google.com/privacy?hl=en&gl=uk) |
| DotMailer | To send marketing emails and for some marketing automation. |
| HubSpot (CRM) | To hold data for marketing purposes and to keep a record of interested parties with whom we would like to communicate with for marketing and legitimate interest processing purposes.  For more on HubSpot see:  <https://legal.hubspot.com/privacy-policy> |
| Stripe | To process client payments, we use a third party supplier Stripe.  For more on Stripe see:  <https://stripe.com/gb/privacy> |
| Microsoft Azure | Email notifications |

**Storing your personal data**

For marketing and sales communications where we use HubSpot, this data is processed and held in the USA and we have taken all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Please note that where you have a password which enables you to access certain parts of our site, you are solely responsible for keeping this password confidential and you must not disclose it to anyone.

We will do our best to protect your personal data, however the transmission of information via the internet is not completely secure and therefore we cannot guarantee the security of any data you transmit to our site. Once we have received your data it will be processed in line with organisational and technical measures that we have implemented to prevent unauthorised access.

**Disclosing your information**

If we hold your personal information, we may disclose this information to any member of our Group (subsidiaries, holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006) for example sale or transfer of the business.

In certain circumstances, we may disclose your personal information to third parties but only in the following circumstances:

1. If we are required to do so by the courts or to comply with other legal, statutory and/or regulatory obligations, including for accounting and taxation purposes;
2. Where it is necessary to provide you with information or services;
3. To protect your rights, property or safety of AdviserPlus, our customers or other stakeholders (this may include sharing information with other organisations for the purposes of fraud protection or prevention and credit risk management;
4. In the event that we sell or buy any business or assets, where we need to disclose your information to the prospective buyer or seller;
5. If AdviserPlus or all of its assets are acquired by a third party, where personal client information will be one of the asset transferred.

**Your rights**

You have the right to request that we stop processing your personal data at any time for marketing purposes. At the point of data collection, we will give you the option to consent to marketing communications, and once opted in you will have the right to update your preferences at any time or unsubscribe from all communications. You can do this by [by](http://info.adviserplus.com/unsubscribe) emailing [support@wiseowlhr.com](mailto:support@wiseowlhr.com).

Your rights under the General Data Protection Regulation are as follows, which we will adhere to:

* The right to be informed
* The right of access
* The right to rectification
* The right to erasure
* The right to restrict processing
* The right to data portability
* The right to object
* Rights in relation to automated decision making and profiling.

If you wish to exercise these rights, please let us know by emailing [support@wiseowlhr.com](mailto:support@wiseowlhr.com) on the website.

**Data breaches**

If you believe that WiseOwlHR, part of [AdviserPlus Business Solutions Ltd](#_Data_controller), has not complied with your data protection rights, you can complain to the [Information Commissioner](https://ico.org.uk/for-organisations/report-a-breach/).

**Data controller**

Data controller: AdviserPlus Business Solutions Ltd of Woodcourt, Riverside Park, Southwood Road, Bromborough, Wirral CH62 3QX.

**Contact Us – Data Protection**

Data protection queries should be directed to the:

Information Security Manager, AdviserPlus Business Solutions Ltd, Woodcourt, Riverside Park, Southwood Road, Bromborough, Wirral CH62 3QX. Email: [dataprotection@adviserplus.com](mailto:dataprotection@adviserplus.com)

**Changes to our privacy policy**

This Privacy Policy may change from time to time in line with legislation or industry developments and the latest version will be held on the website.

**Version Control**

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| --- | --- | --- | --- | --- |
| Issue | Amendment | Date | Initials | Authorised |
| 1 | Privacy Policy WiseOwlHR.com | 4/12/2018 | CC/BP/ML/AC/MC | CC |
|  |  |  |  |  |