

# PRIVACY POLICY

This privacy policy applies between you, the User of this Website, and North Star Advisory Ltd, the owner and provider of this Website. North Star Advisory Ltd takes the privacy of your information very seriously. This privacy policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the Website.

This privacy policy should be read alongside, and in addition to, our Terms and Conditions, which can be found at: [www.northstaradvisory.co/terms](http://www.northstaradvisory.co/terms).

**Please read this privacy policy carefully.**

## Definitions and interpretation

1. In this privacy policy, the following definitions are used:

<b>Data</b>	collectively all information that you submit to North Star Advisory Ltd via the Website. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws;
<b>Cookies</b>	a small text file placed on your computer by this Website when you visit certain parts of the Website and /or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause below ( <b>Cookies</b> );
<b>Data Protection Laws</b>	any applicable law relating to the processing of personal Data, including but not limited to the GDPR, and any national implementing and supplementary laws, regulations and secondary legislation;
<b>GDPR</b>	the UK General Data Protection Regulation;
<b>North Star Advisory Ltd, we or us</b>	North Star Advisory Ltd, a company incorporated in England and Wales with registered number 13859980 whose registered office is at 132 St. Johns Road, Woking, Surrey, GU21 7PS;
<b>UK and EU Cookie Law</b>	the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011 & the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2018;
<b>User or you</b>	any third party that accesses the Website and is not either (i) employed by North Star Advisory Ltd and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to North Star Advisory Ltd and accessing the Website in connection with the provision of such services; and
<b>Website</b>	the website that you are currently using, <a href="http://www.northstaradvisory.co">www.northstaradvisory.co</a> , and any sub-domains of this site unless expressly excluded by their own terms and conditions.

2. In this privacy policy, unless the context requires a different interpretation:

- a. the singular includes the plural and vice versa;
- b. references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;
- c. a reference to a person includes firms, companies, government entities, trusts and partnerships;
- d. "including" is understood to mean "including without limitation";
- e. reference to any statutory provision includes any modification or amendment of it;
- f. the headings and sub-headings do not form part of this privacy policy.

## Scope of this privacy policy

3. This privacy policy applies only to the actions of North Star Advisory Ltd and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.
4. For purposes of the applicable Data Protection Laws, North Star Advisory Ltd is the "data controller". This means that North Star Advisory Ltd determines the purposes for which, and the manner in which, your Data is processed.

## Data collected

5. We may collect the following Data, which includes personal Data, from you:
  - a. name;
  - b. contact Information such as email addresses and telephone numbers;
  - c. IP address (automatically collected);
  - d. web browser type and version (automatically collected);
  - e. operating system (automatically collected);
  - f. a list of URLs starting with a referring site, your activity on this Website, and the site you exit to (automatically collected);

in each case, in accordance with this privacy policy.

## How we collect Data

6. We collect Data in the following ways:
  - a. data is given to us by you; and
  - b. data is collected automatically.

## Data that is given to us by you

7. North Star Advisory Ltd will collect your Data in a number of ways, for example:
  - a. when you contact us through the Website, by telephone, post, e-mail or through any other means;
  - b. when you use our services;

in each case, in accordance with this privacy policy.

## Data that is collected automatically

8. To the extent that you access the Website, we will collect your Data automatically, for example:
  - a. we automatically collect some information about your visit to the Website. This information helps us to make improvements to Website content and navigation, and includes your IP address, the date, times and frequency with which you access the Website and the way you use and interact with its content.
  - b. we will collect your Data automatically via cookies, in line with the cookie settings on your browser. For more information about cookies, and how we use them on the Website, see the section below, headed "Cookies".

## Our use of Data

9. 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 when using our Website. Specifically, Data may be used by us for the following reasons:
  - a. internal record keeping;in each case, in accordance with this privacy policy.
10. 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 (see the section headed "Your rights" below).
11. We may use your Data to show you North Star Advisory Ltd adverts and other content on other websites. If you do not want us to use your data to show you North Star Advisory Ltd adverts and other content on other websites, please turn off the relevant cookies (please refer to the section headed "Cookies" below).

## Who we share Data with

12. We may share your Data with the following groups of people for the following reasons:
  - a. our employees, agents and/or professional advisors - to contact you;in each case, in accordance with this privacy policy.

## Keeping Data secure

13. We will use technical and organisational measures to safeguard your Data, for example:
  - a. access to your account is controlled by a password and a user name that is unique to you.
  - b. we store your Data on secure servers.
14. 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: [help@northstaradvisory.co](mailto:help@northstaradvisory.co).
15. 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.

## Data retention

16. 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 policy or until you request that the Data be deleted.
17. Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.

## Your rights

18. You have the following rights in relation to your Data:
  - a. **Right to access** - 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.
  - b. **Right to correct** - the right to have your Data rectified if it is inaccurate or incomplete.
  - c. **Right to erase** - the right to request that we delete or remove your Data from our systems.
  - d. **Right to restrict our use of your Data** - the right to "block" us from using your Data or limit the way in which we can use it.
  - e. **Right to data portability** - the right to request that we move, copy or transfer your Data.

- f. **Right to object** - the right to object to our use of your Data including where we use it for our legitimate interests.
19. 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 this e-mail address: [help@northstaradvisory.co](mailto:help@northstaradvisory.co).
  20. 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/>.
  21. It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

## Links to other websites

22. This Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

## Changes of business ownership and control

23. North Star Advisory Ltd 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 North Star Advisory Ltd. 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.
24. We may also disclose Data to a prospective purchaser of our business or any part of it.
25. In the above instances, we will take steps with the aim of ensuring your privacy is protected.

## Cookies

26. This Website may place and access certain Cookies on your computer. North Star Advisory Ltd uses Cookies to improve your experience of using the Website and to improve our range of services. North Star Advisory Ltd has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.
27. All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.
28. Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling North Star Advisory Ltd to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.
29. This Website may place the following Cookies:

Type of Cookie	Purpose
Strictly necessary cookies	These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
Analytical/performance cookies	They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
Functionality cookies	These are used to recognise you when you return to our

	website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region). By using the Website, you agree to our placement of functionality cookie.
Targeting cookies	These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

30. You can find a list of Cookies that we use in the Cookies Schedule.
31. You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please see the help menu in your internet browser. You can switch off Cookies at any time, however, you may lose any information that enables you to access the Website more quickly and efficiently.
32. You can choose to delete Cookies at any time; however, you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.
33. It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.
34. For more information generally on cookies, including how to disable them, please refer to [aboutcookies.org](http://aboutcookies.org). You will also find details on how to delete cookies from your computer.

## General

35. 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.
36. 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.
37. 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.
38. This Agreement 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.

## Changes to this privacy policy

39. North Star Advisory Ltd reserves the right to change this privacy policy 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 policy on your first use of the Website following the alterations.

You may contact North Star Advisory Ltd by email at [help@northstaradvisory.co](mailto:help@northstaradvisory.co).

## Wix Security, Servers, Third Party Services, & Storage

40. Wix hosts your website on a global content delivery network (CDN), a collection of connected secure servers located around the world. Your visitors are automatically directed to their closest server, so your site loads faster for everyone, everywhere.. Wix's free web hosting keeps your data protected across all platforms. With 24/7 security monitoring, HTTPS and SSL protection - your website is always safe and secure. Our extensive hacker testing and DDoS protection make sure you have secure and reliable servers for your site.
41. Our company is hosted on the Wix.com platform. Wix.com provides us with the online platform that allows us to sell our products and services to you. Your data may be stored through Wix.com's data storage, databases and the general

Wix.com applications. They store your data on secure servers behind a firewall. For more insight, you may also want to read Wix's Terms of Service <http://www.wix.com/about/terms-of-use> or Privacy Statement <http://www.wix.com/about/privacy>

#### 42. About Data Storage and Data Transfers

- a. Wix can store your site-visitors' data in a number of locations.
- b. Your site-visitors' personal information may be stored in data centers located in the United States of America, Ireland, South Korea, Taiwan and Israel. We may use other jurisdictions as necessary for the proper delivery of our services and/or as may be required by law.
- c. Wix is a global company that respects the laws of the jurisdictions it operates within. The processing of the User Customer Data may take place within the territory of the European Union, Israel or a third country, territory, or one or more specified sectors within that third country, of which, the European Commission has decided that it ensures an adequate level of protection (transfer on the basis of an adequacy decision).
- d. Important: Any transfer to a third country, outside the European Union, that does not ensure an adequate level of protection according to the European Commission, will be undertaken in accordance with the Standard Contractual Clauses (2010/87/EU) set out in Appendix 1 of the Wix Data Processing Agreement (DPA)
- e. The security of sensitive data is of extreme importance to Wix and we are 100% committed to data protection. See all the security certifications received by Wix.com.

#### 43. Security

- a. Wix has implemented security measures designed to protect the Personal Information you share with us, including physical, electronic and procedural measures. Among other things, we offer HTTPS secure access to most areas on our Services; the transmission of sensitive payment information (such as a credit card number) through our designated purchase forms is protected by an industry standard SSL/TLS encrypted connection; and we regularly maintain a PCI DSS (Payment Card Industry Data Security Standards) certification. We also regularly monitor our systems for possible vulnerabilities and attacks, and regularly seek new ways and Third Party Services for further enhancing the security of our Services and protection of our Visitors' and Users'
- b. However – regardless of the measures and efforts taken by Wix, we cannot and do not guarantee the absolute protection and security of your Personal Information, your Users-of-Users' Information or any other User Content you upload, publish or otherwise share with Wix or anyone else.
- c. We therefore encourage you to set strong passwords for your User Account and User Website, and avoid providing us with any sensitive information which you believe its disclosure could cause you substantial or irreparable harm. Furthermore, because certain areas on our Services are less secure than others (for example, if you set your Support forum ticket to be “Public” instead of “Private”, or if you browse to a non-SSL page), and since e-mail and instant messaging are not recognized as secure forms of communications, we request and encourage you not to share any Personal Information on any of these areas or via any of these methods. Third Party Services

#### 44. Third Party Services

- a. Wix has partnered with a number of selected service providers whose services and solutions complement, facilitate and enhance our own. These include hosting and server co-location services, communications and content delivery networks (CDNs), data and cyber security services, billing and payment processing services, domain name registrars, fraud detection and prevention services, web analytics, email distribution and monitoring services, session recording and remote access services, performance measurement and data optimisation services, content providers, and our legal and financial advisors (collectively, “Third Party Service(s)”).
- b. Such Third-Party Services may receive or otherwise have access to our Visitors' and Users' Personal Information and/or Users-of-Users' Personal Information, in its entirety or in part – depending on each of their particular roles and purposes in facilitating and enhancing our Services, and may only use it for such purposes.
- c. Note that while our Services may contain links to other websites or services, we are not responsible for such websites' or services' privacy practices, and encourage you to be aware when you leave our Services and read the privacy statements of each and every Website and service you visit. This Privacy Policy does not apply to such linked third-party websites and services.
- d. Wix is accountable for personal data that it receives under the Privacy Shield and subsequently transfers to a third party as described in the Privacy Shield Principles. In particular, Wix remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to process the personal data on its behalf do so in a

manner inconsistent with the Principles unless Wix proves that it is not responsible for the event giving rise to the damage.

45. Further information on Wix, their servers, policies, and storage, can be found on their website.

### **Attribution**

46. This privacy policy was created using a document from [Rocket Lawyer](https://www.rocketlawyer.com/gb/en) (https://www.rocketlawyer.com/gb/en).

This privacy policy was created on **23 March 2022**

