

# Privacy Policy for Hunter & Co. Administrative Support

**Last Updated:** 29th August 2025

## 1. Introduction

Welcome to Hunter & Co. Administrative Support. We are committed to protecting your privacy and handling your personal data in a transparent and secure manner. This Privacy Policy explains how we collect, use, store, and share your personal data when you interact with our services, website, or communicate with us.

Hunter & Co. Administrative Support is a sole trader business based in Littlehampton, West Sussex, United Kingdom, operated by Gemma Hunter. For the purposes of UK data protection law, Gemma Hunter (trading as Hunter & Co. Administrative Support) is the **Data Controller** of your personal data.

## 2. Contact Details

If you have any questions about this Privacy Policy or our data protection practices, please contact us:

- **Name:** Gemma Hunter (Hunter & Co. Administrative Support)
- **Email:** [info@hunteradmin.com](mailto:info@hunteradmin.com)
- **Postal Address:** Littlehampton, West Sussex (full address on request)

## 3. The Personal Data We Collect

Personal data means any information about an individual from which that person can be identified. We may collect, use, store, and transfer different kinds of personal data about you, which we have grouped together as follows:

- **Identity Data:** Name, title.
- **Contact Data:** Billing address, delivery address, email address, telephone numbers.
- **Financial Data:** Bank account details (for payments to us), payment card details (processed securely via third-party payment processors like Stripe, we do not store full card details).
- **Service Data:** Details about the services you have purchased from us, your project requirements, documents you provide for proofreading, transcription, or administrative support, and communications related to your projects.
- **Technical Data:** Internet protocol (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 our website.
- **Usage Data:** Information about how you use our website and services.

- **Marketing and Communications Data:** Your preferences in receiving marketing from us and your communication preferences.

We do not collect any **Special Categories of Personal Data** (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data), nor do we collect any information about criminal convictions and offences.

#### 4. How We Collect Your Personal Data

We use different methods to collect data from and about you, including through:

- **Direct interactions:** You may give us your Identity, Contact, and Financial Data by filling in forms, contacting us by phone, email, or through our website, or during consultations for our services. This includes personal data you provide when you:
  - Enquire about or purchase our services.
  - Subscribe to our newsletter or other publications.
  - Provide feedback or contact us with a query.
- **Automated technologies or interactions:** As you interact with our website, we may automatically collect Technical Data about your equipment, Browse actions, and patterns. We collect this personal data by using cookies and other similar technologies
- **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from analytics providers (e.g., Google Analytics).
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services (e.g., Stripe, your bank).
  - Identity and Contact Data from publicly available sources (e.g., Companies House, LinkedIn profiles where public).

#### 5. How We Use Your Personal Data (Lawful Bases)

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to **perform the contract** we are about to enter into or have entered into with you (e.g., to provide you with administrative support, proofreading, or scribing services).
- Where it is necessary for our **legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests (e.g., for direct marketing, improving our services, or for administrative purposes).
- Where we need to comply with a **legal obligation** (e.g., for tax purposes, or to respond to a legal request).
- Where you have given us **consent** to do so (e.g., for specific marketing communications). You have the right to withdraw consent at any time where we are relying on consent to process your personal data.

## Purposes for which we will use your personal data:

Purpose/Activity of Processing	Type of Data	Lawful Basis for Processing
To register you as a new client	Identity, Contact	Performance of a contract
To provide our services to you, manage our relationship, process payments, and recover debts	Identity, Contact, Financial, Service	Performance of a contract; Necessary for our legitimate interests (e.g., debt recovery)
To manage our website and keep it secure	Technical	Necessary for our legitimate interests (e.g., network security, preventing fraud)
To send you service-related communications (e.g., project updates, invoices)	Identity, Contact, Service	Performance of a contract; Necessary for our legitimate interests (e.g., managing our relationship with you)
To send you marketing communications about our services (where you have opted in or where there is a legitimate interest for B2B)	Identity, Contact, Marketing	Consent; Legitimate interests (for B2B marketing where appropriate and not overridden by your rights)
To analyse website usage and improve our services	Technical, Usage	Necessary for our legitimate interests (e.g., to understand how customers use our services and website to develop them)
To comply with legal and regulatory obligations	Identity, Contact, Financial, Service	Necessary to comply with a legal obligation (e.g., HMRC records, ICO compliance)

## 6. Disclosure of Your Personal Data

We may share your personal data with the parties set out below for the purposes stated above:

- **Service Providers:** Third-party service providers who provide IT and system administration services (e.g., Wix, Calendly, email provider), payment processing services (e.g., Stripe), cloud storage (e.g., Google Drive, OneDrive), and accounting software (e.g., FreeAgent).

- **Professional Advisers:** Solicitors, accountants, bankers, auditors, and insurers who provide professional services to us.
- **HM Revenue & Customs (HMRC), regulators, and other authorities:** Who require reporting of processing activities in certain circumstances.
- **Other Third Parties:** As required by law or to protect our legal rights (e.g., debt collection agencies).

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 7. International Transfers

Some of our external third parties (e.g., Wix, Calendly, Google, Microsoft, Stripe) are based outside the UK and European Economic Area (EEA), so their processing of your personal data will involve a transfer of data outside the UK/EEA.

Whenever we transfer your personal data out of the UK/EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK government.
- Where we use certain service providers, we may use specific contracts approved by the UK (e.g., International Data Transfer Agreement (IDTA) or International Data Transfer Addendum (IDTA Addendum)) which give personal data the same protection it has in the UK.

## 8. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered, or disclosed. We limit access to your personal data to only those who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have procedures in place 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.

## 9. Data Retention

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.

By law, we have to keep basic information about our customers (including Contact, Identity, Financial, and Transaction Data) for six years plus the current financial year after they cease being customers for tax purposes.

## 10. Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- **Request access** to your personal data (commonly known as a "data subject access request").
- **Request correction** of the personal data that we hold about you.
- **Request erasure** of your personal data.
- **Object to processing** of your personal data where we are relying on a legitimate interest.
- **Request restriction of processing** of your personal data.
- **Request the transfer** of your personal data to you or to a third party.
- **Withdraw consent** at any time where we are relying on consent to process your personal data.

If you wish to exercise any of the rights set out above, please contact us at [info@hunteradmin.com](mailto:info@hunteradmin.com)

You will not have to pay a fee to access your personal data (or to exercise any of the other 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.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 11. Right to Lodge a Complaint

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would,

however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

## **12. Changes to This Privacy Policy**

We keep our Privacy Policy under regular review. This version was last updated on 29th of August 2025.

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