



# Forefathers

Putting you in touch with your roots

# Forefathers

10 Withyholt Park, Cheltenham, GL53 9BP, UK

Tel: +44 (0)1242 323550

Fax: +44 (0)1242 323117

research@forefathers.co.uk

<http://www.forefathers.co.uk>

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## PRIVACY POLICY

### BACKGROUND:

Forefathers Ltd. understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this any of our websites ("Our Sites"), namely:

[www.forefathers.co.uk](http://www.forefathers.co.uk)

[www.gloucestershire-ancestry.co.uk](http://www.gloucestershire-ancestry.co.uk)

[www.gloucestershireancestry.co.uk](http://www.gloucestershireancestry.co.uk)

[www.glosancestry.co.uk](http://www.glosancestry.co.uk)

[www.glos-ancestry.co.uk](http://www.glos-ancestry.co.uk)

We will only collect and use personal data in ways that are described here, and in a manner 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 Our Privacy Policy is deemed to occur upon your first use of Our Sites. If you do not accept and agree with this Privacy Policy, you must stop using Our Sites immediately.

### 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 Our Sites;
<b>"Cookie"</b>	means a small text file placed on your computer or device by Our Sites when you visit certain parts of Our Sites and/or when you use certain features of Our Sites. Details of the Cookies used by Our Sites are set out in section 13, below;

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**“Cookie Law”**

means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

**“personal data”**

means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Sites. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”); and

**“We/Us/Our”**

means Forefathers Ltd., a limited company registered in England under company number 7929212, Pillar House, 117-119 Bath Road, Cheltenham, GL53 7LS, UK, and whose main trading address is 10 Withyholt Park, Cheltenham, GL53 9BP, UK.

Gloucestershire Ancestry is a trading name of Forefathers Ltd.

## 2. Information About Us

- 2.1 Our Sites is owned and operated by Forefathers Ltd., a limited company registered in England under company number 7929212, whose registered address is Pillar House, 117-119 Bath Road, Cheltenham, GL53 7LS, and whose main trading address is 10 Withyholt Park, Cheltenham, GL53 9BP.
- 2.2 We are not VAT registered.
- 2.3 Our Data Protection Officer is Peter Clifford of Forefathers Ltd., and can be contacted by email at [research@forefathers.co.uk](mailto:research@forefathers.co.uk), by telephone on +44 (0)1242 323550, or by post at 10 Withyholt Park, Cheltenham, GL53 9BP.
- 2.4 We are a associate members of the Association of Genealogist and Researchers in

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Archives (AGRA).

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

This Privacy Policy applies only to your use of Our Sites. Our Sites 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.

### 4. **Your Rights**

4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

4.1.1 The right to be informed about Our collection and use of personal data;

4.1.2 The right of access to the personal data We hold about you (see section 12);

4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 14);

4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 14);

4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;

4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);

4.1.7 The right to object to Us using your personal data for particular purposes; and

4.1.8 Rights with respect to automated decision making and profiling.

4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

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## 5. What Data Do We Collect?

Depending upon your use of Our Sites, We may collect some or all of the following personal and non-personal data.

Please also see section 13 on Our use of Cookies and similar technologies.

Please also refer to our separate Data Protection Policy on the subject of additional personal data about yourself and other individuals We might collect and retain by means other than Our Sites, for use in the course of Our services to you).

- 5.1 name;
- 5.2 contact information (email address, telephone number);
- 5.3 country of origin;
- 5.4 IP address;
- 5.5 web browser type and version;
- 5.6 operating system;
- 5.7 a list of URLs starting with a referring site, your activity on Our Sites, and the site you exit to;

## 6. How Do We Use Your Data?

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.
- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:
  - 6.2.1 Providing and managing your Account;
  - 6.2.2 Providing and managing your access to Our Sites;
  - 6.2.3 Personalising and tailoring your experience on Our Sites;

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6.2.4 Supplying Our services to you (please note that We require your personal data in order to enter into a contract with you);

6.2.5 Personalising and tailoring Our services for you;

6.2.6 Replying to emails from you;

6.2.7 Analysing your use of Our Sites and gathering feedback to enable Us to continually improve Our Sites and your user experience;

6.3 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.

6.4 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data collected through Our Sites will therefore be retained for the following periods (or its retention will be determined on the following bases):

6.4.1 5 years from the date of first contact;

## 7. How and Where Do We Store Your Data?

7.1 We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.

7.2 Some or all of your data may be stored outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). This may be the case where We use cloud-based services such as online accounting systems (e.g. FreshBooks) and cloud-based storage (e.g. Google Drive). In these instances, We have no control over the physical location of the storage facility used by Our service providers.

You are deemed to accept and agree to this by using Our Sites and submitting information to Us. If We do store data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR including:

7.2.1 ensuring that the services used comply fully with the relevant standards and legislation.

7.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Sites.

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7.4 Refer to our separate Data Protection policy document for details.

## 8. Do We Share Your Data?

8.1 Subject to section 8.2, We will not share any of your data with any third parties for any purposes.

8.2 We may compile statistics about the use of Our Sites including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

## 9. What Happens If Our Business Changes Hands?

9.1 We 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 Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being 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 that data only for the same purposes for which it was originally collected by Us.

## 10. How Can You Control Your Data?

10.1 Refer to Section 4 for your rights under the GDPR.

10.2 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.

## 11. Your Right to Withhold Information

11.1 You may access certain areas of Our Sites without providing any data at all. However, to make contact with Us and solicit a response from Us you may be required to submit or allow for the collection of certain data.

11.2 You may restrict Our use of Cookies. For more information, see section 13.



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## 12. How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details at [research@forefathers.co.uk](mailto:research@forefathers.co.uk), or using the contact details below in section 14.

## 13. Our Use of Cookies

13.1 Our Sites 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 Sites and to provide and improve Our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

13.2 All Cookies used by and on Our Sites are used in accordance with current Cookie Law.

13.3 Before Cookies are placed on your computer or device, you will be shown a banner at the top of the webpage 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 Sites may not function fully or as intended.

13.4 Certain features of Our Sites depend on Cookies to function. Cookie Law deems these Cookies to be "strictly necessary". These Cookies are shown below in section 13.5. 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 in section 13.9, but please be aware that Our Sites 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.

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

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Name of Cookie	Purpose	Strictly Necessary
Random string of alphanumeric characters	Used for website functionality and navigation	Yes
Local storage	Used for website functionality and navigation	Yes
fmalertcookies	Used for displaying cookie authorization banner	Yes

13.6 Our Sites uses analytics services provided by Google. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Sites is used. This, in turn, enables Us to improve Our Sites and the services offered through it. 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 Sites, it does enable Us to continually improve Our Sites, making it a better and more useful experience for you.

13.7 The analytics service(s) used by Our Sites use(s) Cookies to gather the required information.

13.8 The analytics service(s) used by Our Sites use(s) the following Cookies:

Name of Cookie	First / Third Party	Provider	Purpose
__utm? (where ? is any alphabetic character)	Third	Google Analytics	Google Analytics

13.9 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,

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please consult the help menu in your internet browser or the documentation that came with your device.

- 13.10 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 Sites more quickly and efficiently including, but not limited to, login and personalisation settings.
- 13.11 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.

#### 14. **Contacting Us**

If you have any questions about Our Sites or this Privacy Policy, please contact Us by email at [research@forefathers.co.uk](mailto:research@forefathers.co.uk), by telephone on +44 (0)1242 323550, or by post at Forefathers Ltd., 10 Withyholt Park, Cheltenham, GL53 9BP, UK. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12, above).

#### 15. **Changes to Our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Sites and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Sites following the alterations. We recommend that you check this page regularly to keep up-to-date.