

Privacy Policy

1. Introduction

Saligo Design is **committed to safeguarding the privacy of our website visitors, customers and service users**. Your personal information is private as such we will ensure that it is kept safe and handled with respect.

In this policy "**we**", "**us**" and "**our**" refer to Saligo Design Ltd, its directors and staff members. For more information about us and how to contact us please use the "More about us" link below.

This policy applies where we are acting as a data controller with respect to your personal information; in other words, where we determine the purposes and means of the processing of that personal data.

You can find **detailed information in our Privacy Policy about your personal information** in relation to: what we do with it, why we collect it, how it is used, how long it is kept for and most importantly how we keep it safe and secure. We also highlight your principal rights under the data protection law.

We want you to have the best possible experience through the use of our website and services. By using our website and agreeing to this policy, you **consent to the use of cookies** in accordance with the terms of this policy. If you would like to learn more about Cookies and the types of Cookies that we use then please refer to our Cookies Policy found here or in section 8 of this privacy policy.

[More about Us](#)

Our details

This website is owned and operated by Saligo Design Ltd.

We are registered in England and Wales under registration number 6457885 and our registered office is at Woodlands Farm, Woodlands Lane, Stoke D'Abernon, Cobham, KT11 3PY

Our principal place of business is at Woodlands Farm, Woodlands Lane, Stoke D'Abernon, Cobham, KT11 3PY

You can contact us:

- a.) by post, to the postal address given above;
- b.) using our website contact form or website instant project estimate tool;
- c.) by telephone, on the contact number published on our website from time to time; or
- d.) by email, using the email address published on our website from time to time.

Our representative responsible for Data Privacy Matters (Mr M Donald) can be contacted using the information above or directly by email at the following address privacy@saligodesign.com.

2. How we collect your personal information

We will only collect your information when you engage with us or use our website. This includes using our estimation tool, contact page and purchasing samples or products on our website. We may also collect your personal information over the telephone or via email when you are making a sales enquiry or purchasing a product or service. In addition, we collect your personal information

when we are providing you with a product or service, and/or when we create an account for you or your business or your employer. If you sign up to our newsletter on our website, verbally or in writing then we would also collect your personal information.

[Show more details](#)

We collect your information in the following ways shown below:

1. When you are **interacting with our website** in the following areas:
 - a. Instant Estimation (Our online estimation tool)
 - b. Filling in our contact form
 - c. Purchasing Products
 - d. Purchasing Samples
 - e. Signing up to our newsletter
2. If you make a **sales enquiry** via email or over the telephone.
3. If you **purchase a product** or service from us over the phone or via email.
4. If you **contact us** by phone, email or by post regarding our business products or services.
5. If you **interact with our Social Media pages**, we do not store this information (as it is stored on the respective social media platforms in accordance with their privacy terms), however we would have the ability to review your information until such time that you update your privacy settings on these social media platforms.
6. If we contact you for the purpose of purchasing a product or service from your business; in other words our business suppliers, service providers or if you work with us in any capacity relating to our business.
7. Occasionally we may collect your information from **third parties such as referrals** (for example your details were given to us from a person that you know whom has asked us to contact you for the purpose of an antique mirror glass project that you are currently working on) – NB: We would only ever store your information upon your consent to do so and this would only be done when you have given permission to the relevant third party to share that data that they hold on you with us.

3. The types personal information that we collect

In order to provide you with our products and services we may collect personal information about you. We always ask for consent from you beforehand and the information that we collect is only used for the purpose of carrying out our business, communicating with you about your project or financial account with us and keeping you informed about our business if you choose us to. You never have to give us information if you choose not to however that may limit the ability for us to assist you with your project, answer questions, provide quotations or help with our products and services. We may also process your data for the purpose of monitoring and improving our website and services if you allow and for the purpose of processing financial transactions including accounting and record keeping.

More details

The types of information that we collect has been categorised in three methods listed below. Each point details the type of information collected in each method.

a.) Directly

Personal Information that we obtain directly from you include your name, email address, telephone contact number(s), delivery address, billing address and payment and/or card details. Please note, we do not hold payment information for any longer than it takes to process your transaction.

b.) Through the use of our website

The data that we collect through the use of our website may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is Google Analytics: <https://www.google.co.uk/analytics>; our analytics tracking system and Google Adwords: <https://adwords.google.com>

c.) Independently

Occasionally we obtain information about you that is shared with us by a third party, for example a referral of business [refer to point 7 under How we collect your personal information], or from our social media platforms if you have elected to share your details with us [Check your privacy settings of such websites learn more about your data security across your social media accounts] or via a publicly listed resource, for example finding your business contact number on a Search Engine. This information generally relates to your name and contact details.

4. How and why we use your personal information

We use your personal information in order to operate our business and provide you with our products and services in the best possible way. We also use your information to improve our services and provide a better experience for you. For example we would analyse the data obtained through the use of our website in order to enhance its performance and better serve our customers,

In this section we have set out the following:

- a.) The general categories of personal data that we may process; [these include usage, service, publication, enquiry, transaction, notification, correspondence and other data]
- b.) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
- c.) the purposes for which we may process personal data; and
- d.) the legal bases of the processing

We use the data as set out below in the general categories of personal data ethically and with the intention of providing you with a great level of service. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

How and why we use this data is set out in the categories listed below.

[Read More](#)

Learn about why we collect and use the data described in each category below.

- **Usage Data**

We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is Google Analytics: <https://www.google.co.uk/analytics>; our analytics tracking system and Google Adwords: <https://adwords.google.com>; our paid search advertising platform. This usage data may be processed for the purposes of analysing the use of the website and services and for improving our marketing efforts on Search Engines. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website, services and marketing efforts.

- **Account Data**

We may process your account data ("**account data**"). The account data may include your name, email address, telephone contact number and physical address and/or billing address. The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website, providing our services, providing quotations or estimations, general communication about your account, communication about our products and services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent and/or our legitimate interests, namely the proper administration of our website and business and/or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

- **Service Data**

We may process your personal data that are provided in the course of the use of our services ("**service data**"). The service data may include your name, telephone contact number(s), email address, physical address, photographs that you submit to us in relation to your project, written communication corresponded via email, billing address. The source of the service data is you or your employer. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

- **Publication Data**

We may process information that you consent for us to post for publication on our website or through our services ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is consent to publish your review or testimonial about our products and services.

- **Enquiry Data**

We may process information contained in any enquiry you submit to us regarding goods and/or services and/or general information ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing, providing quotations or estimations, communication with you about your project and selling relevant goods and/or services to you. The legal basis for this processing is consent.

- **Transaction Data**

We may process information relating to transactions, including purchases of goods and services that you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests is contractual necessity, namely our interest in the proper administration of our website and business and/or processing payment for products or services and/or issuing refunds where applicable.

- **Notification Data**

We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent and/or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

- **Correspondence Data**

We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms and online estimation tool. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users, existing customers and/or prospective new customers.

- **The use of data for necessary, legal and other specific purposes**

We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for

compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

Please do not supply any other person's personal data to us, unless we prompt you to do so.

5. Our handling of your information and provision of your personal data to others

- 5.1. We may disclose your personal data to any member of our company and our companies staff members whom are engaged in either installations, sales or account management insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.
- 5.2. We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 5.3. We may disclose your personal data to our suppliers or subcontractors insofar as reasonably necessary for carrying out our service offering and/or upon your consent to do so. Our third party providers, suppliers or subcontractors can only deliver the service for which they are specifically required to do, such as process payment and/or retain data for the purposes of Banking, Finance and HMRC legislation. For this reason any data that is disclosed to third party providers will be specific to the required task (for example: Delivery companies required to execute a successful delivery would require the name and delivery address only). As such we are committed to protecting your personal information and will never give it out unless it relates directly to the fulfilment of our contractual obligations and/or should you provide us with consent to do so.
- 5.4. Financial transactions relating to our website and services are OR may be handled by our payment services providers, namely:

- Pay Pal: <https://www.paypal.com> and/or
- Ecwid: <https://www.ecwid.com/> and/or
- Barclaycard: <https://www.barclaycard.co.uk> and/or
- Barclays Bank: <https://www.barclays.co.uk/>

We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at the following URL'S:

- PayPal: <https://www.paypal.com/gi/webapps/mpp/ua/privacy-full>
- Ecwid: <https://www.ecwid.com/privacy-policy>
- Barclaycard: <https://www.barclaycard.co.uk/business/privacy-and-cookie-policy>
- Barclays Bank: <https://www.barclays.co.uk/important-information/privacy-policy/>

- 5.5. We may disclose your enquiry data to one or more of those selected third party suppliers of goods and services identified on our website or via communication verbally or in writing between you and us for the purpose of enabling them to contact you so that they can offer, market and sell to you relevant goods and/or services. Each such third party will act as a data controller in relation to the enquiry data that we supply to it; and upon contacting you, each such third party will supply to you a copy of its own privacy policy, which will govern that third party's use of your personal data.
- 5.6. In addition to the specific disclosures of personal data set out in this Section 5, we may disclose your personal data where such disclosure is necessary for compliance with a **legal obligation** to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the **establishment, exercise or defence of legal** claims, whether in court proceedings or in an administrative or out-of-court procedure.

6. How we retain and protect personal data

As Saligo design is committed to protecting all personal data that we retain, we've set out our data retention policies and procedures which are designed to ensure that any data is fully protected and also to help ensure that we comply with our legal obligations in relation to the retention and protection of personal data.

Please note: Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. You can access the personal data that we hold on you by contacting us using any method in point one of this policy.

6.1. We will retain your personal data as follows:

We will keep your information only for as long as is reasonably necessary for the purposes set out in this privacy notice and to fulfil our legal and/or contractual obligations. We will never misuse your personal information or allow it to be unsecure and we will not retain more information than we need. The retention period will vary according to the purpose, for example if purchasing a product or service from us then we will typically keep your data for up to 6 years from the date of your last transaction whereas if you have consented for us to publish your data on our website (Testimonial) then those details will be retained until notified by you or your executors or if you've made a sales enquiry and do not wish to proceed with an order then your information could be deleted with immediate effect. Other reasons for retaining your information and/or email correspondence is for the purpose of resolving issues that may arise and/or discussions that you wish to have with us concerning your project.

For further information about how long we will keep your information, please contact the privacy@saligodesign.com or by using the contact details outlined in this notice.

In some cases it is not possible for us to specify in advance the periods of time for which your personal data will be retained. As such we will determine the period of retention based on the following criteria:

- The period of retention of **Usage Data** will be determined based on The Privacy Policy of Google Analytics: <https://www.google.co.uk/analytics>; our analytics tracking system and Google Adwords: <https://adwords.google.com>.
- the period of retention of **account data** will be determined based on The legal requirements as set out by HM Revenue and Customs: <https://www.gov.uk/government/organisations/hm-revenue-customs> for the purpose of keeping accounting records required by law as according to HMRC and Companies House and according to the privacy policy of our Accounting Software which can be viewed here: <https://quickbooks.intuit.com/uk/privacy-policy/>
- the period of retention of **publication data** will be determined based on consent and/or request of removal from the individual or organization that has granted us permission to display such publication data on our website or advertising tools. This refers to reviews or testimonials given to us for publication on our website or sent to us via email or in writing. Retention of publication data will remain with us indefinitely and until the request to delete or remove the information is received by us.
- the period of retention of **notification data** will be determined based on the Privacy Policy of our marketing automation platform namely: Mail Chimp. URL can be found here: <https://mailchimp.com/legal/privacy/>
- Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- We do not retain your personal card details or payment information as this data is retained by the appropriate payment provider or bank (as described in point 5.4 above) however we do retain **transaction history data** for the purpose of analysing the performance of our business finances.
- Our Website is hosted by a service hosting provider that is located in the USA. By using our website your data may be transferred to these servers. Prime examples are Facebook, Google or Webflow (Our Hosting Service Provider). We will with all reasonable efforts, ensure that organisations who are a part of the EU privacy shield initiative will handle your personal information. Please take a look at this certification here: <https://www.privacyshield.gov> . Please also review the steps that our hosting service provider is taking in relation to protecting your personal data in accordance with the GDPR: <https://webflow.com/blog/preparing-for-the-gdpr>

7. Amendments

- 7.1. We may update this policy from time to time by publishing a new version on our website.
- 7.2. You should check this page occasionally to ensure you are happy with any changes to this policy.
- 7.3. We may notify you of changes to this policy by email

8. Your Rights

In this Section 8, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

Privacy matters are taken very seriously at Saligo Design, and as such, If you would like to access the your personal information that we retain or would like us to remove or amend such information then please get in touch with us via email at privacy@saligodesign.com.

The read more section below describes your principal rights under the data protection law concerning your personal information.

[Read More](#)

Your principal rights under data protection law are:

- a.) the right to access;
- b.) the right to rectification;
- c.) the right to erasure;
- d.) the right to restrict processing;
- e.) the right to object to processing;
- f.) the right to data portability;
- g.) the right to complain to a supervisory authority; and
- h.) the right to withdraw consent

You have the right to **confirmation as to whether or not we process your personal data** and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. You can access by requesting it in writing via post or email.

You have the right to **have any inaccurate personal data about you rectified** and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

In some circumstances you have the right to the **erasure of your personal data without undue delay**. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully

processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary includes; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

In some circumstances you have the right to **restrict the processing of your personal data**. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

You have the right to **object to our processing of your personal data on grounds relating to your particular situation**, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

You have the right to **object to our processing of your personal data for direct marketing purposes** (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

You have the right to **object to our processing of your personal data for scientific or historical research purposes** or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

To the extent that the legal basis for our processing of your personal data is:

- (a) Consent; or
- (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to **lodge a complaint with a supervisory authority responsible for data protection**. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

To the extent that the legal basis for our processing of your personal information is consent, you have the right to **withdraw that consent at any time**. Withdrawal will not affect the lawfulness of processing before the withdrawal.

You may **exercise any of your rights in relation to your personal data** by written notice to us OR by email or by telephone. In addition to the other methods specified in this Section 8.

8.) Cookies Policy

8.1) About Cookies

Cookies are small text files that may be stored on your computer or other device when you visit a website. They are generally used to make websites work, to keep track of your movements within the website, to remember your login details, and so on.

Technically; A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

We use Cookies on our website to enhance your browsing experience, to track website usage data and allow our website to function.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

[Read more about Cookies](#)

There are different types of cookies, and they can be distinguished on the basis of their origin, function and lifespan. Important characteristics of cookies include the following:

First party cookies are cookies that are placed by the website you are visiting, while third party cookies are placed by a website other than the one you are visiting. Please note that we do not control the collection or further use of data by third parties.

Necessary cookies are necessary to allow the technical operation of a website (e.g., they enable you to move around on a website and to use its features).

Performance cookies collect data on the performance of a website such as the number of visitors, the time spent on the website and error messages.

Functionality cookies increase the usability of a website by remembering your choices (e.g. language, region, login, and so on).

Targeting/advertising cookies enable a website to send you personalized advertising.

Session cookies are temporary cookies that are erased once you close your browser while persistent or permanent cookies stay on your device until you manually delete them or until your browser deletes them based on the duration period specified in the persistent cookie file.

More information on all aspects of cookies can be found on www.allaboutcookies.org. Please note that Saligo Designs has no affiliation with, and is not responsible for, this third party website.

8.2) why do we use cookies?

We may use cookies to:

- distinguish between visitors;
- improve the use and the functionality of our website;

- tailor our website and products to your needs and preferences; and
- analyse how our website is used and compile anonymous and aggregate statistics.

We do not use the collected information to create visitor profiles.

8.3) Types and purpose of the cookies we use:

What types of cookies do we use?

An overview of the cookies used on this website is set out in the following table.

Name	First Party or Third Party?	Duration	Purpose	Types of data collected
_ga	Third party (Google Analytics)	2 years	Functionality (site analytics)	Visitor ID data used to distinguish visitors.
_gid	Third party (Google Analytics)	24 hours	Functionality (site analytics)	Visitor ID data used to distinguish visitors.
_gat	Third party (Google Analytics)	1 minute	Functionality (limiting request rate)	Visitor ID data used to limit request rate, to minimise bandwidth impact.
has_js	Third party (Google Analytics)	Session	Functionality (site analytics)	Visitor ID data used to distinguish visitors.
id	Third party (DoubleClick)	2 years	Functionality (advertising)	Visitor ID data used in connection with advertising.

Please note that the processing of your personal data in connection with cookies, and for other purposes, is governed by our Privacy Policy.

In addition, we may also use web beacons (or clear GIFs) and other similar technologies in addition to, or in combination with, cookies. A web beacon is typically a transparent graphic image (usually 1 pixel x 1 pixel) that is placed on a website or in an email and it helps us to understand the behaviour of visitors of our website. More information on web beacons can be found at <http://www.allaboutcookies.org/faqs/beacons.html> . Please note that Saligo Designs has no affiliation with, and is not responsible for, this third party website.

How can you control cookies and web beacons?

Most internet browsers are set to automatically accept cookies. Depending on your browser, you can set your browser to warn you before accepting cookies, or you can set it to refuse them. Please

refer to the 'help' button or 'settings' (or similar) on your browser to learn more about how you can do this.

Disabling cookies may impact your experience on our websites, Blocking all cookies will have a negative impact upon the usability of many other websites and If you block cookies, you will not be able to use all the features on our website.

If you use different devices to access our websites, you will need to ensure that each browser of each device is set to your cookie preference.

More information on how to manage cookies is available from: <http://www.allaboutcookies.org/manage-cookies/>. Please note that Saligo Design has no affiliation with, and is not responsible for, this third party website.

In addition, you may opt-out from cookies by visiting the following sites and selecting which company cookies you would like to opt-out from: <http://www.aboutads.info/choices/#completed> and <http://www.youronlinechoices.com/>. Please note that Saligo Design has no affiliation with, and is not responsible for, these third party websites.

Cookies used by our service providers

Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

Ongoing steps that Saligo Design is taking for the protection of your personal information

- 1.) In house training, practice and methodology in relation to the retention of personal data by staff members on email or on file.
- 2.) Deletion of sales enquiries, quotations or estimations from our system if they are not needed to operate our business or assist you with information about our products or services
- 3.) Deletion of emails that are held for 4 years or more (Bi-annual task), and according to the terms in this privacy policy.