**GDPR Green Thickies Policy**

**Organisation details**

Katherine Kyle: Director and CEO

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**Purposes of data processing**

Green Thickies collects data from email subscribers who want to download a free guide or booklet from the website. The customer’s name and email address is stored and Green Thickies contacts them again by email with helpful information about health and green smoothies.

Once a subscriber becomes a customer, their payment details and address are inputted into a system so the products can be shipped out to them.

Sub-contractor information is used to help run the business.

**Categories of individuals**

Email subscribers

Customers

Sub-contractors

**Categories of personal data**

Name

Email address

Address

Payment details

Product bought

Email list subscribed to

Date subscribed

**Transfers to third countries**

Data collection tools are used to secure the data. Some of these are based in other countries. The following tools are used and have taken action to secure data to be compliant with GDPR:

Active Campaign

Stripe

Paypal

Facebook

Shopify

**Transfer Mechanism Safeguards**

Green Thickies will tell email subscribers that they will receive email from only Green Thickies, no spam.

Green Thickies will delete inactive subscribers who have unsubscribed from the email lists.

Once on the email list, Active Campain provides an unsubscribe link at the bottom of every email so people can easily remove themselves. They can also email us and we will manually unsubscribe them.

They can also ask to be ‘forgotten’ so they are removed entirely from the system.

**Retention schedules**

Emails are stored only for 60 days on the Green Thickies email list. After that they are sent a sequence of emails asking them if they want to remain on the email list. If they don’t respond to the emails they are removed from the email list and Green Thickies will no longer email them.

**Sub-contractor information**

The name and email address of sub-contractors is provided via a third party system called Upwork. Upwork stores sub-contractor bank details but Green Thickies never receives them. Payment is taken from Green Thickies and delivered to the sub-contractor.

Some sub-contractors are paid with PayPal invoices. Their name and email address are emailed to Green Thickies with the invoice.