



Commentary Services (“us”, “we”, or “our”) operates this website commentaryservices.co.uk (the “Service”).

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy.

Definitions

PERSONAL DATA

“Personal Data” means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

USAGE DATA

“Usage Data” is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

DATA CONTROLLER

“Data Controller” means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed.

For the purpose of this Privacy Policy, we are a Data Controller of your data.

DATA PROCESSOR (OR SERVICE PROVIDERS)

“Data Processor” (or “Service Provider”) means any person (other than an employee of the Data Controller) who processes the data on behalf of the Data Controller. We



may use the services of various Service Providers in order to process your data more effectively.

DATA SUBJECT

“Data Subject” is any living individual who is the subject of Personal Data.

USER

The “User” is the individual using our Service. The User corresponds to the Data Subject, who is the subject of Personal Data.

COOKIES

“Cookies” are small pieces of data stored on a User’s device.

Information Collection and Use

We collect several different types of information for various purposes to provide and improve our Service to you.

Types of Data Collected

PERSONAL DATA

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you (“Personal Data”).

Personally identifiable information may include, but is not limited to:

- First name and last name
- Email address
- Phone number
- Place of business
- Website
- Social Media contacts (ir Linked In/Twitter)



We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by emailing sales@commentaryservices.co.uk and simply use the wording “Opt Out” in the subject.

USAGE DATA

We may also collect information how the Service is accessed and used (“Usage Data”). This Usage Data may include information such as your computer’s Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

LOCATION DATA

We may use and store information about your location if you give us permission to do so (“Location Data”). We use this data to provide features of our Service, to improve and customise our Service.

You can enable or disable location services when you use our Service at any time, through your device settings.

Use of Data

Commentary Services may use the collected data for various purposes:

- To provide and maintain our Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service
- To detect, prevent and address technical issues



- To provide you with news, offers and general information about other services and events we offer that are similar to those that you have already enquired about or been involved with, unless you have opted not to receive such information

Retention of Data

Commentary Services will retain your Personal Data only for as long as it is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Commentary Services will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

Transfer of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your country or other governmental jurisdiction, where the data protection laws may differ than those from your jurisdiction.

If you are located outside the United Kingdom and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United Kingdom and process it there.

Your consent to this Privacy Policy, followed by your submission of such information, represents your agreement to that transfer.

Commentary Services will take all of the reasonably necessary steps to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of Personal Data will take place to an organisation or a country unless there are adequate controls in place, including the security of your data and other personal information.



Disclosure of Data

Disclosure for Law Enforcement

Under certain circumstances, Commentary Services may be required to disclose Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Legal Requirements

Commentary Services may disclose Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Sutton Silver Limited
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability
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Security of Data

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we take the necessary precautions to protect your Personal Data using commercially acceptable means, we cannot guarantee its absolute security.

Your Rights

Commentary Services aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

Whenever possible, you can update your Personal Data by contacting us directly to make the required changes.



If you wish to be informed of what Personal Data we hold about you and if you want it to be removed from our records, please contact us.

In certain circumstances, you have the right to:

- access and receive a copy of the Personal Data we hold about you
- rectify any Personal Data held about you that is inaccurate
- request the deletion of Personal Data held about you

Please note that we may ask you to verify your identity before responding to such requests.

Service Providers

We may employ third party companies and individuals to facilitate our Service (“Service Providers”), to provide the Service on our behalf, to perform Service-related services or to assist us in analysing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Google Analytics

This Service uses Google Analytics to monitor and analyse the use of our Service.

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data may be shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.



For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy>

Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Children's Privacy

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information of Children under the age of 18. If you are a parent or guardian and you believe that your Child/Children may have provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from Children without verification of parental consent, we will take the appropriate steps to remove that information from our records.

Changes to this Privacy Policy

We may update our Privacy Policy from time to time. Any changes to this Privacy Policy will be notified within the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "last updated" date at the bottom of this page.



You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, please contact us:

Email: sales@commentaryservices.co.uk

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