

# Privacy & Security Policy

This privacy and security policy applies between you, the owner of your personal information and GDPR Systems Ltd, the owner and provider of this Website and other services. GDPR Systems Ltd takes the privacy and security of your personal information very seriously. This privacy policy applies to our use of any and all Personal Information collected by us or provided by you in relation to your use of the Website and other services.

**Please read this privacy and security policy carefully.**

## ***Definitions and interpretation***

1. In this privacy and security policy, the following definitions are used:

<b>Data/Personal Information</b>	collectively all personal information that you submit to GDPR Systems Ltd via the Website or other means. This definition incorporates, where applicable, the definitions provided in the Data Protection Act 2018;
<b>Cookies</b>	a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause below ( <b>Cookies</b> );
<b>GDPR Systems Ltd, we, us</b>	GDPR Systems Ltd, a company incorporated in England and Wales with registered number 10914374 whose registered office is at 7 Jacobs Yard, Middle Barton, Chipping Norton, Oxfordshire, OX7 7BY;
<b>UK and EU Cookie Law</b>	the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;
<b>User or you</b>	(i) employed by GDPR Systems Ltd and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to GDPR Systems Ltd and accessing the Website and other services in connection with the provision of such services; and

**Website & Other Services** the website that this document refers to is [www.gdprsystems.co.uk](http://www.gdprsystems.co.uk), and any sub-domains of this site unless expressly excluded by their own terms and conditions. Other Services includes any other service that we offer and you use that is not to do with our website.

2. In this privacy policy, unless the context requires a different interpretation:
  1. the singular includes the plural and vice versa;
  2. references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;
  3. a reference to a person includes firms, companies, government entities, trusts and partnerships;
  4. "including" is understood to mean "including without limitation";
  5. reference to any statutory provision includes any modification or amendment of it;
  6. the headings and sub-headings do not form part of this privacy policy.

### ***Scope of this privacy policy***

1. This privacy policy applies only to the actions of GDPR Systems Ltd and Users with respect to our services including our website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.

### ***Personal information collected and lawful basis for using this personal information***

1. We will collect personal information from you during the course of your interactions with us by both digital and physical means. The list of personal information we will collect from you will be shown in full in Appendix A.
2. We will be clear in the reason that we are using your personal information, and this will be shown in Appendix A.
3. We will also have a lawful basis for using your personal information and this will be shown in Appendix A.

### **How have we asked for your consent (if this is our lawful basis for using your personal information)?**

#### ***Explicit consent.***

To gain your consent we have asked you explicitly by using either our website, email or physical means of communication;

This list is not exhaustive and is meant as indicative only as we can't list every potential way of gaining your explicit consent.

***Where do we send your personal information once it is processed?***

Where applicable we will send your personal information to various sources. A full list of which companies and countries we send your personal information to and the level of security we use to send them can be found in Appendix B.

***Our use of your personal information***

1. For purposes of the Data Protection Act 2018, GDPR Systems Ltd is either the "data controller" or "data processor". For specific details of which personal information we are the "data controller" or "data processor" for see Appendix B.
2. We will retain any personal information you submit for the duration of any contract agreed by both parties with the minimum period of time being 12 months.
3. Unless we are obliged or permitted by law to do so, and subject to any third party disclosures specifically set out in this policy, your personal information will not be disclosed to third parties. This includes our affiliates and / or other companies within our group.
4. All personal information is stored securely in accordance with the principles of the Data Protection Act 2018 and with the GDPR that came into force in May 2018. For more details on security see the clause below (**Security**).
5. Any or all of the above personal information may be required by us from time to time in order to provide you with the best possible service and experience when using our services. Specifically, personal information will be used by us for the following reasons:
  1. internal record keeping;
  2. improvement of our products / services;
  3. transmission by email of promotional materials that may be of interest to you;

in each case, in accordance with this privacy policy.

***Changes of business ownership and control***

1. GDPR Systems Ltd 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 GDPR Systems Ltd. Personal information provided by Users will, where it is relevant to any part of our business so 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 the Personal Data for the purposes for which it was originally supplied to us.
2. We may also disclose personal information to a prospective purchaser of our business or any part of it.
3. In the above instances, we will take steps with the aim of ensuring your privacy is protected.

### ***Controlling use of your personal information***

1. Wherever you are required to submit personal information, you will be given options to restrict our use of that personal information. This may include the following:
2. use of personal information for direct marketing purposes; and
3. sharing personal information with third parties.

### ***Accessing your own Data – Subject Access Requests***

1. You have the right to ask for a copy of any of your personal information held by GDPR Systems Ltd (where such personal information is held). The first request is by law free of charge however please note that any additional requests for the same information for the same reasons may be incur a reasonable admin charge.
2. To do this you must write to Simon Bishop at [simon.bishop@gdprsystems.co.uk](mailto:simon.bishop@gdprsystems.co.uk), telephone 07966196523 and request a Subject Access Request Form. Please complete this form and send to Simon Bishop at [simon.bishop@gdprsystems.co.uk](mailto:simon.bishop@gdprsystems.co.uk), telephone 07966196523.

### ***Other rights under the GDPR / DPA 2018***

You also have:

1. The right to be informed

What we do with your personal data as well as our lawful basis for processing it is detailed in this privacy policy.

2. The right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.

3. The right to erasure

You have the right to ask us to erase your personal information in certain circumstances.

4. The right to restrict processing

You have the right to ask us to restrict the processing of your information in certain circumstances.

5. The right to data portability

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another, or give it to you. The right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated.

6. The right to object

You have the right to object to processing if we are able to process your information because the process forms part of our public tasks, or is in our legitimate interests.

7. Rights in relation to automated decision making and profiling

We do not carry out any automated decision making or profiling.

For more information please visit the ICO website at,

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

### **Security**

1. Personal information security is of great importance to GDPR Systems Ltd and to protect your personal information we have put in place suitable physical, electronic and managerial procedures to safeguard and secure personal information collected via our Website and other means.
2. If password access is ever required, you are responsible for keeping this password confidential.
3. We endeavour to do our best to protect your personal information. However, transmission of information over the internet is not entirely secure and is done at your own risk. We cannot ensure the security of your personal information transmitted to the Website.

### **Website**

#### **Functionality of the Website**

1. To use all features and functions available on the Website, you may be required to submit certain personal information.
2. You may restrict your internet browser's use of Cookies. For more information see the clause below (**Cookies**).

### ***Third party websites and services***

1. GDPR Systems Ltd may, from time to time, employ the services of other parties for dealing with certain processes necessary for the operation of the Website. The providers of such services do not have access to certain personal information provided by Users of this Website.

### ***Links to other websites***

1. If you use our Website, it may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

### ***Cookies***

1. This Website may place and access certain Cookies on your computer. GDPR Systems Ltd uses Cookies to improve your experience of using the Website and to improve our range of products. GDPR Systems Ltd has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.
2. All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.
3. Before the Website places Cookies on your computer, you will be presented with a pop-up requesting your consent to set those Cookies which says a version of;

'We use analytical/performance cookies and functionality cookies to provide statistics that help us give you the best experience of our site. You can find out more or switch them off if you prefer. However, by continuing to use the site without changing settings, you are agreeing to our use of cookies. ***Click here to confirm your agreement to our using cookies.***'

By giving your agreement to the placing of Cookies, you are enabling GDPR Systems Ltd to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.

4. This Website may place the following Cookies:

Type of Cookie	Purpose
Analytical/performance cookies	They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
Functionality/Tracking cookies	These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
Third Party cookies	These are cookies stored in your computer and have been created by a website with a domain different to GDPR Systems Ltd. These cookies will be used by advertisers to track your browsing history.

5. You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.
6. You can choose to delete Cookies at any time; however you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.
7. It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

**General**

1. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.
2. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.
3. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.
4. This Agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

***Changes to this privacy & security policy***

1. GDPR Systems Ltd reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations.

You may contact GDPR Systems Ltd by email to Simon Bishop at [simon.bishop@gdprsystems.co.uk](mailto:simon.bishop@gdprsystems.co.uk).

**25th March 2019**



## Appendix A

### 1. Company Email

Communication with clients, prospects and business partners

Photos/Images; Financial Details; Physical Address; Email Address; Name; Mobile Telephone Number; Landline Telephone Number

Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject. \*Note that this condition is not available to processing carried out by public authorities in the performance of their tasks.

### 2. Customer Subscriptions - Online

We process this information at the customers request once they have signed up online via our website - we need it to be able to help them be GDPR ready

Landline Telephone Number; Name; Email Address; Mobile Telephone Number; Physical Address

Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract.

### 3. Customer Subscriptions - resellers

To enable us to manage our customers once they subscribe to the system

Landline Telephone Number; Email Address; Mobile Telephone Number; Name; Physical Address

Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract.

### 4. Website Cookies

to be able to monitor how the website is performing

Cookies (Strictly Necessary)

Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject. \*Note that this condition is not available to processing carried out by public authorities in the performance of their tasks.

### 5. Website leads

To be able to contact potential customers who have expressed an interest in finding more about GDPR systems

Email Address; Name; Mobile Telephone Number

Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject. \*Note that this condition is not available to processing carried out by public authorities in the performance of their tasks.

***Appendix A (continued)***

***Appendix A (continued)***

## **Appendix B**

### **1. Customer communications**

To inform subscribers of any business relating to their use of the portal - including commercials  
Email Address; Name; Landline Telephone Number; Physical Address; Mobile Telephone Number  
NO LEGAL BASIS GIVEN

### **2. Marketing**

To keep customers up to date with changes and improvements to the systems  
Name; Email Address  
NO LEGAL BASIS GIVEN

### **3. Outbound web portal info**

For customers to use the portal  
Email Address; Name; Physical Address; Mobile Telephone Number  
NO LEGAL BASIS GIVEN

### **4. Reseller Communications**

To inform resellers of any information regarding commercials or systems  
Landline Telephone Number; Email Address; Mobile Telephone Number; Name  
NO LEGAL BASIS GIVEN

### **5. Resetting customer passwords**

To reset customer passwords on their request  
Name; Email Address  
NO LEGAL BASIS GIVEN

***Appendix B (continued)***

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