

## Privacy Policy

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you, as prospective Customers of our Company, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

### 1. Data Protection Principles

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data

### 2. Types Of Data Held

We keep several categories of personal data in order to carry out our services. Specifically, we hold the following types of data:

- a) personal details such as your name, address, telephone number, email address.
- b) IP addresses, cookie strings or mobile device ID's.
- c) location data.
- d) if you contact us by telephone, your telephone call may be recorded

### 3. How We Use Your Personal Data

In this Section we have set out:

- a) the general categories of personal data that we may process;
- b) the purposes for which we may process personal data; and
- c) the legal bases of the processing.

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. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

We may process your account data ("**account data**"). The account data may include your name and email 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, 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 our legitimate interests, namely the performance of a contract between you and us.

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, address, telephone number, email 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

## Privacy Policy

databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the performance of a contract between you and us.

We may process information contained in any enquiry you submit to us regarding goods and/or services (“**enquiry data**”). The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you. The legal basis for this processing is consent.

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.

In addition to the specific purposes for which we may process your personal data set out in this section, 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.

### 4. Providing Your Personal Data To Others

We may disclose your personal data to our insurers, professional advisers or financial institutions 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 or debt collection whether in court proceedings or in an administrative or out-of-court procedure. We may disclose name, address, phone numbers, email address to our suppliers or subcontractors insofar as reasonably necessary in order to carry out our services.

### 5. Retaining And Deleting Personal Data

This Section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

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.

We will retain your personal data as follows:

- a)** Service data and Account data will be retained for a minimum period of 12 months and for a maximum period of 6 years.

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

Notwithstanding the other provisions of this Section, 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.

### 6. Your Rights

You have the following rights in relation to the personal data we hold on you:

- a)** the right to be informed about the data we hold on you and what we do with it;
- b)** the right of access to the data we hold on you. We operate a separate Subject Access Request policy and all such requests will be dealt with accordingly;
- c)** the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as ‘rectification’;
- d)** the right to have data deleted in certain circumstances. This is also known as ‘erasure’;
- e)** the right to restrict the processing of the data;
- f)** the right to transfer the data we hold on you to another party. This is also known as ‘portability’;
- g)** the right to object to the inclusion of any information;
- h)** the right to regulate any automated decision-making and profiling of personal data.

## Privacy Policy

In addition to the above rights, you also have the unrestricted right to withdraw consent, that you have previously provided, to our processing of your data at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

If you wish to exercise any of the rights explained above, please contact the Data protection officer

### 7. How we use Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. However this may prevent you from taking full advantage of the website.

### 8. Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over those websites. We can therefore not be held responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question

### 9. Making a Complaint

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

### 10. Our Details

We are registered in England and Wales under registration number 16807156 and our registered office is: 514 Hertford Road, London, N9 8AE

You can contact us:

- a)** by post, to the postal address given above;
- b)** using our website contact form;
- c)** by telephone or email, published on our website.

### 11. Data Protection Officer

Our data protection officer's contact details are: Sid Dhuny, at our registered office.