

Our Privacy Policy

Your rights, your information and what you need to know

Introduction

Your privacy is important to us and we want you to understand what we do with your information and that we are committed to protecting your personal information.

This privacy policy contains important information about how we at Warranty Administration Services Limited (using the trading styles Crystal Clear Warranty and Service Plans, GenAssist Rescue & Recovery and DriveCover): collect your personal information, what we do with that information, who we may share it with and why, and your rights regarding the personal information we have about you.

We may need to make changes to our Privacy Policy from time to time and we reserve the right to do that without notice. Please check our website if you want to stay up to date with any changes we may have made. If we make significant changes regarding where your data will be processed, we will contact you to let you know.

We will always comply with the applicable data protection law when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk). For the purposes of the GDPR, we will be: the 'Data Processor' of all personal data we hold about you in respect of the administration of Crystal Clear Warranty, Service Plans and DriveCover; and the 'Data Controller' of all personal data we hold about you in respect of GenAssist Rescue & Recovery, as well as staff, supplier and any other data streams we have. Please note that it is your responsibility to check and ensure all information, content, material or data you provide to us is correct, complete and accurate.

As we take your privacy very seriously, the following principles underpin our approach to protecting and respecting your personal information:

- 1) We value the trust that you place in us by giving us your personal information. We will always use your personal information in a way that is fair, lawful, and transparent.
- 2) The information that is collected is only done so for specified, explicit and legitimate purposes and not further processed in a way that is incompatible with those purposes.
- 3) We will provide clear information about how we use your personal information.
- 4) We will take all reasonable steps to protect your information from misuse and keep it secure.
- 5) We will take all reasonable steps to ensure any information we hold is accurate and kept up to date.
- 6) We will not keep your information for longer than necessary.
- 7) We will comply with all applicable data protection laws and regulations and we will co-operate with data protection authorities.

This Privacy Policy applies to the personal information of our Website Users, Customers, Suppliers, Staff and other people who we may contact.

This version of our Privacy Policy was last updated 16th May 2018.

How to contact us

If you have any questions about our privacy policy or the information we collect or use about you, please contact:

FAO Data Protection Team
Warranty Administration Services Limited
Otago House
Crofton Road
Lincoln
LN3 4NL
Email: data@warrantyadmin.co.uk
Tel: 01522 515603

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OUR PRIVACY POLICY RELATING TO WEB USERS

1. Website Users Privacy Notice

For clarity it should be noted that Warranty Administration Services Limited act as 'Data Controller' for the data collected from our web sites.

1.1 What personal information do we collect and process?

We collect a limited amount of information from our website users which may include:

- Information about how you use our website.*
- The frequency with which you access our website.*
- The location you view our website from (IP Address).*
- Any information you provide us with when you contact us via a web chat function, such as name and email address.

*Please note: this is statistical data about our users' browsing actions and patterns and does not identify any individual, and the above list of personal data categories is not exhaustive.

1.2 How do we collect personal information?

We only collect personal information to enable us to fulfil a request for further information that you may require. This information consists of:

- Your name / postcode
- Your business name / type of business
- Your telephone number
- Your e-mail address

1.2.1 Personal Data that we collect automatically

When you visit our website, there is a certain amount of information we collect as detailed in section 1.1. This information is automatically collected whether you use our services or not.

This data is collected by our servers and via cookies, in line with cookie settings in your browser. Please see our cookies policy for more information.

1.3 How do we use your personal data?

The limited information we collect from website users is used to help us improve your experience when using our website and to help us manage the products and services we provide.

We do not link personally identifiable information to IP addresses, but we can and will use IP addresses to identify a user where we feel it is necessary to enforce compliance with this Privacy Policy and our website terms of use, to protect our site users, to comply with applicable laws and to trace a computer in cases of misuse or unlawful actions in connections with visits to or use of the website.

1.4 Who do we share your information with?

We can confirm that we will never pass on or sell personal details to other parties for any purposes. And we are committed to keeping your personal information safe and secure.

1.5 Why do we process your personal data?

We will only collect and use your personal information in accordance with applicable data protection laws. We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. Our grounds for processing your personal information include:

1.5.1 Consent

Where necessary we will only collect and process your personal information if you have given your consent for us to do so, for example, we will only send you certain marketing information if we have your consent.

1.5.2 Legitimate Interests

We may use and process some of your personal information where we have sensible and legitimate business grounds for doing so. Under European privacy laws there is a concept of “legitimate interests” as a justification for processing your personal information. Our legitimate interests for processing your personal information may include:

- to enable you to access and use our products and services.
- to communicate with you about the products and services you receive from us. We need to keep you informed about your use of the products and services, for example sending you a confirmation email of any renewals or documents. This won't include marketing communications unless you have given us your consent to receive these.
- because it is necessary to provide the product or service you have requested.
- processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment.

1.5.3 Performance of a Contract

The use of your personal information may be necessary to perform a contract that you have with us. If you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

1.5.4 Legal Obligation

The use of your personal information is necessary for us to meet our legal or regulatory obligations including the purposes of performing or exercising obligations or rights of the employer or employee under employment law.

1.5.5 Substantial Public interest

Processing is necessary for reasons of substantial public interest on the basis of applicable law.

1.6 How do we safeguard your personal data?

Your personal data is very important to us, and we take information and system security very seriously; we strive to comply with our obligations at all times. In order to safeguard personal data, we have implemented accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction, this includes measures to deal with any suspected data breach and includes any information that is collected, recorded and used in any way, whether on paper, online or any other medium.

We do our best to keep the information you disclose to us secure so, where appropriate, our sites use HTTPS, however, it is understood that any information you provide us with over the internet can never be guaranteed to be 100% secure. Certain information, for example, your payment details, are encrypted to minimise the risk of interception during transit, and for any payments we take from you online we will use a recognised online secure payment system.

You may complete a registration process when using our website, which may include the creation of a username or password. Any such details should be kept confidential by you and should not be disclosed or shared with anyone. If you do disclose this information, you are solely responsible for all activities undertaken on the site where they are used. To protect your account, we ask that you create a strong password, that is lengthy and includes a mixture of alphabetical and numerical characters. Your password can only be reset with access to the email address registered on our system.

By using our website, you accept the inherent risks of providing information online.

1.7 How long do we keep your data for?

We will keep your personal information on our systems for no longer than is necessary after the expiry of any product or service supplied by us.

We may keep statistical information but only where required to meet our reporting obligations. The length of time that we retain statistical information for these reasons will vary depending on the obligations we need to meet.

We securely destroy all financial information once we have used it and no longer need it.

1.8 What are your Individual rights?

Data protection law sets out several rights that you have in relation to how we use your information. If you would like to invoke your rights please contact us and we will seek to deal with your request without undue delay, and in accordance with applicable laws. Please note that we may keep a record of your communication to help us resolve any issues you may raise.

1.8.1 Your Rights

Subject to certain limitations on certain rights, your individual rights are:

1.8.1.1 Right to be informed

You have the right to receive clear and easy to understand information about the personal information we have, why we have it and who we may share it with – this is detailed in this Privacy Policy.

1.8.1.2 Right to withdraw consent

Where we have obtained your consent to process your personal data for certain activities or consent to market to you, you may withdraw your consent at any time. You can withdraw your consent by contacting us and we will respond to your request without undue delay. Withdrawal will not affect the lawfulness of processing based solely on your consent before the withdrawal.

1.8.1.3 Right of access

You have the right of access to your personal information and supplementary information at any time, this will allow you to be aware of and verify the lawfulness of processing.

If you do wish to receive a copy of the personal information we hold about you, you may make a Data Subject Access Request (DSAR). This must be made in writing to our address, and at this point we may comply with your request or do one of the following:

- We may ask you to verify your identity or ask for more information about your request; and
- Where we are legally permitted to do so, we may decline your request. If your request is declined, we will provide you with the reasons why.

1.8.1.4 Right to rectification

If the personal information is inaccurate or incomplete, you have the right to request that this is corrected.

1.8.1.5 Right to request erasure

You can ask for your information to be deleted or removed in certain situations. There may be occasions where we will not agree with your request and if your request is declined, we will provide you with the reasons why.

This is also known as 'the right to be forgotten'.

1.8.1.6 Right to restrict processing

You can ask that we block or suppress the processing of your personal information for certain reasons.

1.8.1.7 Right to data portability

If you wish, you have the right to transfer your data from us to another data controller. In certain circumstances, you may move, copy or transfer personal data easily from one IT environment to another in a safe and secure way.

1.8.1.8 Right to object

You can object to us processing your personal information where it's based on our legitimate interests, and you do not agree with such legitimacy, for direct marketing and if we were using it for scientific/historical research and statistics.

1.8.1.9 Rights related to automatic decision making including profiling

You have the right to ask us to:

- Give you information about the processing of your personal information.
- Request human intervention or challenge a decision where processing is done solely by automated processes.
- Carry out regular checks to make sure that our automated decision making, and profiling processes are working as they should.

1.8.2 Fees

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

1.8.3 What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

1.8.4 Response time

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

1.9 Complaints

If you are not satisfied with the way any request, you make in relation to your personal information is handled by us then you have the right to refer your complaint to the relevant data protection regulator which in the UK is the Information Commissioner's Office:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
<https://ico.org.uk/concerns/>
0303 123 1113

This Privacy Policy shall be governed and construed in all respects in accordance with the laws of England.

OUR PRIVACY POLICY RELATING TO OUR STAFF

2. Staff

For clarity it should be noted that Warranty Administration Services Limited act as 'Data Controller' for all data held on staff.

2.1 What personal information do we collect and process?

Depending on the relevant circumstances and applicable laws and requirements, we may collect some or all of the following personal information:

- General Identification and contact information this includes your name, address, telephone numbers and email addresses.
- Date of Birth / Age.
- Marital Status.
- Nationality / Citizenship / Place of Birth.
- Educational Background and Employment History.
- Wage, Benefit and Payroll information; including but not limited to national insurance number and banking details.
- Emergency contact information.*
- Referee details* and any information provided by your referee during the course of phone calls, emails and letters.
- Details of any criminal convictions, background checks, driving licence numbers, vehicle registration and driving history, where permitted by law and applicable.
- Visual images collected via closed circuit television (CCTV) when you visit our premises or from copies of photographic ID.
- Information required for us to comply with laws, the requests and directions of law enforcement authorities or court orders (e.g. child support and debt payment information).
- Acknowledgements regarding our policies, including employee handbooks, ethics and/or conflicts of interest policies and other company policies where applicable.
- Date of resignation or termination, reason for resignation or termination, information relating to administering termination of employment (eg references).
- Information provided during your contact with us during the course of phone calls, emails and letters including any information relating to any previous applications you may have made to us and/or any previous employment history with us.
- To the extent that you access our website we will also collect certain data from you. Please see Section 1 for more information.

We may also collect some 'Special Category' information where applicable and / or required, this may include:

- Diversity information including racial or ethnic origin, religious or other similar beliefs, and physical or mental health, including disability-related information.
- Trade union membership.
- Information concerning gender/sex, sexual orientation, and gender re-assignment.
- Information concerning health, such as absence records, disability, and occupational health.

Please note: the above list of personal data categories is not exhaustive.

*If you are providing us with another person's information you should first ask them to read this Privacy Policy. By giving us information about another person you are confirming that they have given you consent to provide the information to us and that they understand how their details will be used.

2.2 How do we collect personal information?

We collect and maintain different types of personal information in respect of those individuals who seek to be, are, or were employed by us, this information will be collected in a number of ways.

2.2.1 Personal Data that we receive directly from you

We may collect personal information directly from you, from a variety of sources such as:

- When you provide us with a copy of your CV and/or an application form.
- When you apply for a vacancy internally or externally.
- Where you contact us proactively, usually by phone, email or letter, for example, if a current member of staff provides us with absence information via email.
- Where we contact you either by phone or email.

2.2.2 Personal Data that we receive from other sources

We may receive your information from third parties where applicable, such as recruitment agencies, the disclosure and barring service, and referees whose details you provide us with. We may also obtain information about you from searching for potential employees from third party sources, such as LinkedIn and other job sites.

2.2.3 Personal Data that we collect automatically

When you visit our website, there is a certain amount of information we collect as detailed in Section 1.

This data is collected by our servers and via cookies, in line with cookie settings in your browser.

Please see our cookies policy for more information.

Information about you will also be collected automatically by CCTV on the premises when you visit/attend work.

2.3 How do we use your personal data?

We may use your personal information for a number of reasons including:

- Determining eligibility for employment, which will include the verification of references.
- Ensuring safe working practices.
- Administering pay and benefits.
- Carrying out our obligations arising from any contracts entered into between us.
- Carrying out our obligations arising from any contracts entered into between us and third parties in relation to your recruitment.
- Monitoring Staff Conduct and ensuring that company policies and procedures are adhered to.
- Establishing training and development requirements.
- Conducting performance reviews.
- Establishing a point of contact in the event of an emergency whilst you are at work.

- In order to comply with our health and safety and occupational health obligations.
- Where applicable, to administer and manage statutory and company sick pay.
- Gathering evidence for any disciplinary actions, or termination.
- Compliance with our legal, regulatory and corporate governance obligations including compliance with statutory requests from HMRC, DWP and other relevant public authorities/ agencies.
- To communicate with you during the course of recruitment, employment and termination/resignation.
- For our own management information purposes including: managing our business operations such as maintaining accounting records, analysis of financial results, internal audit requirements and receiving professional advice (eg tax or legal advice).
- Telephone recordings are used to verify content and may be used together with staff records for regulatory compliance, quality control and staff training, preventing or detecting criminal activity and for complaint resolution.
- Any other reasons required for the operational processes of the business.
- In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

2.4 Who do we share your information with?

We can confirm that we will never pass on or sell personal details to other parties for any purposes. And we are committed to keeping your personal information safe and secure.

2.5 Why do we process your personal data?

We will only collect and use your personal information in accordance with applicable data protection laws. We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. Our grounds for processing your personal information include:

2.5.1 Consent

Where necessary we will only collect and process your personal information if you have given your consent for us to do so, for example, we will only send you certain marketing information if we have your consent.

2.5.2 Legitimate Interests

We may use and process some of your personal information where we have sensible and legitimate business grounds for doing so. Under European privacy laws there is a concept of 'legitimate interests' as a justification for processing your personal information. Our legitimate interests for processing your personal information may include:

- To enable you to access and use our products and services
- To communicate with you about the products and services you receive from us. We need to keep you informed about your use of the products and services, for example sending you a confirmation email of any renewals or documents. This won't include marketing communications unless you have given us your consent to receive these.
- Because it is necessary to provide the product or service you have requested.
- Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment.

2.5.3 Performance of a Contract

The use of your personal information may be necessary to perform a contract that you have with us. If you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

2.5.4 Legal Obligation

The use of your personal information is necessary for us to meet our legal or regulatory obligations including the purposes of performing or exercising obligations or rights of the employer or employee under employment law.

2.5.5 Substantial Public interest

Processing is necessary for reasons of substantial public interest on the basis of applicable law.

2.6 How do we safeguard your personal data?

Your personal data is very important to us, and we take information and system security very seriously; we strive to comply with our obligations at all times. In order to safeguard personal data, we have implemented accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction, this includes measures to deal with any suspected data breach and includes any information that is collected, recorded and used in any way, whether on paper, online or any other medium.

We do our best to keep the information you disclose to us secure so, where appropriate, our sites use HTTPS, however, it is understood that any information you provide us with over the internet can never be guaranteed to be 100% secure. Certain information, for example, your payment details, are encrypted to minimise the risk of interception during transit, and for any payments we take from you online we will use a recognised online secure payment system.

You may complete a registration process when using our website, which may include the creation of a username or password. Any such details should be kept confidential by you and should not be disclosed or shared with anyone. If you do disclose this information, you are solely responsible for all activities undertaken on the site where they are used. To protect your account, we ask that you create a strong password, that is lengthy and includes a mixture of alphabetical and numerical characters. Your password can only be reset with access to the email address registered on our system.

By using our website, you accept the inherent risks of providing information online.

2.7 How long do we keep your data for?

We will keep your personal information on our systems for no longer than is necessary after the expiry of any product or service supplied by us.

We may keep statistical information but only where required to meet our reporting obligations. The length of time that we retain statistical information for these reasons will vary depending on the obligations we need to meet.

We securely destroy all financial information once we have used it and no longer need it.

2.8 What are your Individual rights?

Data protection law sets out several rights that you have in relation to how we use your information. If you would like to invoke your rights please contact us and we will seek to deal with your request without undue delay, and in accordance with applicable laws. Please note that we may keep a record of your communication to help us resolve any issues you may raise.

2.8.1 Your Rights

Subject to certain limitations on certain rights, your individual rights are:

2.8.1.1 Right to be informed

You have the right to receive clear and easy to understand information about the personal information we have, why we have it and who we may share it with – this is detailed in this Privacy Policy.

2.8.1.2 Right to withdraw consent

Where we have obtained your consent to process your personal data for certain activities or consent to market to you, you may withdraw your consent at any time. You can withdraw your consent by contacting us and we will respond to your request without undue delay. Withdrawal will not affect the lawfulness of processing based solely on your consent before the withdrawal.

2.8.1.3 Right of access

You have the right of access to your personal information and supplementary information at any time, this will allow you to be aware of and verify the lawfulness of processing.

If you do wish to receive a copy of the personal information we hold about you, you may make a Data Subject Access Request (DSAR). This must be made in writing to our address, and at this point we may comply with your request or do one of the following:

- We may ask you to verify your identity or ask for more information about your request; and
- Where we are legally permitted to do so, we may decline your request. If your request is declined, we will provide you with the reasons why.

2.8.1.4 Right to rectification

If the personal information is inaccurate or incomplete, you have the right to request that this is corrected.

2.8.1.5 Right to request erasure

You can ask for your information to be deleted or removed in certain situations. There may be occasions where we will not agree with your request and if your request is declined, we will provide you with the reasons why.

This is also known as ‘the right be forgotten’.

2.8.1.6 Right to restrict processing

You can ask that we block or suppress the processing of your personal information for certain reasons.

2.8.1.7 Right to data portability

If you wish, you have the right to transfer your data from us to another data controller. In certain circumstances, you may move, copy or transfer personal data easily from one IT environment to another in a safe and secure way.

2.8.1.8 Right to object

You can object to us processing your personal information where it's based on our legitimate interests, and you do not agree with such legitimacy, for direct marketing and if we were using it for scientific/historical research and statistics.

2.8.1.9 Rights related to automatic decision making including profiling

You have the right to ask us to:

- Give you information about the processing of your personal information.
- Request human intervention or challenge a decision where processing is done solely by automated processes.
- Carry out regular checks to make sure that our automated decision making, and profiling processes are working as they should.

2.8.2 Fees

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

2.8.3 What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

2.8.4 Response time

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

2.9 Complaints

If you are not satisfied with the way any request, you make in relation to your personal information is handled by us then you have the right to refer your complaint to the relevant data protection regulator which in the UK is the Information Commissioner's Office.

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

<https://ico.org.uk/concerns/>

0303 123 1113

This Privacy Policy shall be governed and construed in all respects in accordance with the laws of England.

OUR PRIVACY POLICY RELATING TO OUR SUPPLIERS

3. Suppliers

For clarity it should be noted that Warranty Administration Services Limited act as 'Data Controller' for the administration of data held on our suppliers.

3.1 What personal information do we collect and process?

Depending on the relevant circumstances and applicable laws and requirements, we may collect some or all of the following personal information:

- Publicly available information about your organisation such as address, contact information, directors information.
- General identification and contact information of certain members of the organisations— this includes your name, address, telephone numbers and email addresses.
- Names and contact information of applicable contact persons at your organisation.
- Your credit rating information.
- Payment information.
- Information provided during your contact with us during the course of phone calls (these may be recorded), emails and letters.
- To the extent that you access our website we will also collect certain data from you. Please see Section 1 for more information.

Please note: the above list of personal data categories is not exhaustive.

3.2 How do we collect personal information?

We collect and maintain different types of personal information in respect of those individuals who seek to be, are, or were suppliers of us, this information will be collected in a number of ways:

3.2.1 Personal Data that we receive directly from you

We may collect personal information directly from you, from a variety of sources such as:

- Where you contact us proactively, usually by phone, email or letter to discuss your products / services with us.
- Where we contact you either by phone or email.

3.2.2 Personal Data that we receive from other sources

We may use publicly available sources to confirm your information, for example, the Information Commissioners Office and Companies House.

In the course of our due diligence and where applicable we may also obtain information from third party agencies, for example, credit reference agencies, The Disclosure and Barring Service and financial sanctions registers.

3.2.3 Personal Data that we collect automatically

When you visit our website, there is a certain amount of information we collect as detailed in Section 1.

This data is collected by our servers and via cookies, in line with cookie settings in your browser. Please see our cookies policy for more information.

Information about you will also be collected automatically by CCTV on the premises when you visit.

3.3 How do we use your personal data?

We may use the information we collect about you for a number of reasons, including:

- Determining your suitability as a supplier by conducting due diligence.
- To store (and update when necessary) your details on our database, so that we can contact you in relation to our agreements.
- To obtain support and services from you.
- To arrange payment for any products and services you provide.
- Ensuring safe working practices.
- It is necessary for us to meet and comply with our regulatory and legal obligations.
- Carrying out our obligations arising from any contracts entered into between us.
- Monitoring and reviewing your compliance to your obligations arising from any contracts entered into between us.
- For our own management information purposes including: managing our business operations such as maintaining accounting records, analysis of financial results, internal audit requirements and receiving professional advice (e.g. tax or legal advice).
- Internal Record Keeping - Telephone recordings are used to verify content and may be used together with staff records for regulatory compliance, quality control and staff training, preventing or detecting criminal activity and for complaint resolution.
- Any other reasons required for the operational processes of the business.
- In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

3.4 Who do we share your information with?

We can confirm that we will never pass on or sell personal details to other parties for any purposes. And we are committed to keeping your personal information safe and secure.

3.5 Why do we process your personal data?

We will only collect and use your personal information in accordance with applicable data protection laws. We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. Our grounds for processing your personal information include;

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Where necessary we will only collect and process your personal information if you have given your consent for us to do so, for example, we will only send you certain marketing information if we have your consent.

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We may use and process some of your personal information where we have sensible and legitimate business grounds for doing so. Under European privacy laws there is a concept of 'legitimate interests' as a justification for processing your personal information. Our legitimate interests for processing your personal information may include:

- To enable you to access and use our products and services.
- To communicate with you about the products and services you receive from us. We need to keep you informed about your use of the products and services, for example sending you a confirmation email of any renewals or documents. This won't include marketing communications unless you have given us your consent to receive these.
- Because it is necessary to provide the product or service you have requested.
- Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment.

3.5.3 Performance of a Contract

The use of your personal information may be necessary to perform a contract that you have with us. If you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3.5.4 Legal Obligation

The use of your personal information is necessary for us to meet our legal or regulatory obligations including the purposes of performing or exercising obligations or rights of the employer or employee under employment law.

3.5.5 Substantial Public interest

Processing is necessary for reasons of substantial public interest on the basis of applicable law.

3.6 How do we safeguard your personal data?

Your personal data is very important to us, and we take information and system security very seriously; we strive to comply with our obligations at all times. In order to safeguard personal data, we have implemented accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction, this includes measures to deal with any suspected data breach and includes any information that is collected, recorded and used in any way, whether on paper, online or any other medium.

We do our best to keep the information you disclose to us secure so, where appropriate, our sites use HTTPS, however, it is understood that any information you provide us with over the internet can never be guaranteed to be 100% secure. Certain information, for example, your payment details, are encrypted to minimise the risk of interception during transit, and for any payments we take from you online we will use a recognised online secure payment system.

You may complete a registration process when using our website, which may include the creation of a username or password. Any such details should be kept confidential by you and should not be disclosed or shared with anyone. If you do disclose this information, you are solely responsible for all activities undertaken on the site where they are used. To protect your account, we ask that you create a strong password, that is lengthy and includes a mixture of alphabetical and numerical characters. Your password can only be reset with access to the email address registered on our system.

By using our website, you accept the inherent risks of providing information online.

3.7 How long do we keep your data for?

We will keep your personal information on our systems for no longer than is necessary after the expiry of any product or service supplied to us.

We may keep statistical information but only where required to meet our reporting obligations. The length of time that we retain statistical information for these reasons will vary depending on the obligations we need to meet.

We securely destroy all financial information once we have used it and no longer need it.

3.8 What are your Individual rights?

Data protection law sets out several rights that you have in relation to how we use your information. If you would like to invoke your rights please contact us and we will seek to deal with your request without undue delay, and in accordance with applicable laws. Please note that we may keep a record of your communication to help us resolve any issues you may raise.

3.8.1 Your Rights

Subject to certain limitations on certain rights, your individual rights are:

3.8.1.1 Right to be informed

You have the right to receive clear and easy to understand information about the personal information we have, why we have it and who we may share it with – this is detailed in this Privacy Policy.

3.8.1.2 Right to withdraw consent

Where we have obtained your consent to process your personal data for certain activities or consent to market to you, you may withdraw your consent at any time. You can withdraw your consent by contacting us and we will respond to your request without undue delay. Withdrawal will not affect the lawfulness of processing based solely on your consent before the withdrawal.

3.8.1.3 Right of access

You have the right of access to your personal information and supplementary information at any time, this will allow you to be aware of and verify the lawfulness of processing.

If you do wish to receive a copy of the personal information we hold about you, you may make a Data Subject Access Request (DSAR). This must be made in writing to our address, and at this point we may comply with your request or do one of the following:

- We may ask you to verify your identity or ask for more information about your request; and
- Where we are legally permitted to do so, we may decline your request. If your request is declined, we will provide you with the reasons why.

3.8.1.4 Right to rectification

If the personal information is inaccurate or incomplete, you have the right to request that this is corrected.

3.8.1.5 Right to request erasure

You can ask for your information to be deleted or removed in certain situations. There may be occasions where we will not agree with your request and if your request is declined, we will provide you with the reasons why.

This is also known as ‘the right be forgotten’.

3.8.1.6 Right to restrict processing

You can ask that we block or suppress the processing of your personal information for certain reasons.

3.8.1.7 Right to data portability

If you wish, you have the right to transfer your data from us to another data controller. In certain circumstances, you may move, copy or transfer personal data easily from one IT environment to another in a safe and secure way.

3.8.1.8 Right to object

You can object to us processing your personal information where it's based on our legitimate interests, and you do not agree with such legitimacy, for direct marketing and if we were using it for scientific/historical research and statistics.

5.8.1.9 Rights related to automatic decision making including profiling

You have the right to ask us to:

- Give you information about the processing of your personal information.
- Request human intervention or challenge a decision where processing is done solely by automated processes.
- Carry out regular checks to make sure that our automated decision making, and profiling processes are working as they should.

3.8.2 Fees

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

3.8.3 What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

3.8.4 Response time

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

3.9 Complaints

If you are not satisfied with the way any request, you make in relation to your personal information is handled by us then you have the right to refer your complaint to the relevant data protection regulator which in the UK is the Information Commissioner's Office.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
<https://ico.org.uk/concerns/>
0303 123 1113

This Privacy Policy shall be governed and construed in all respects in accordance with the laws of England.