



# PRIVACY POLICY NOTICE

## INTRODUCTION

This is the SCS privacy policy notice.

SCS respects your privacy and is committed to protecting your personal data. This privacy notice will inform you how we look after your personal data and tell you about your privacy rights and how the law protects you.

### 1. IMPORTANT INFORMATION AND WHO WE ARE

#### 1.1 PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how SCS collects and processes your personal data through your use of our website or any other correspondence.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

#### 1.2 CONTROLLER

Shirley Computer Services Ltd (company number: **03519890**) having its registered office at 25 Spring Lane, London, SE25 4SP is the controller and responsible for your personal data (collectively referred to as SCS, “we”, “us” or “our” in this privacy notice).

If you have any questions about this privacy notice, including any requests to exercise your rights, please contact the SCS using the details set out below.

#### 1.3 CONTACT DETAILS

Full name of legal entity: Shirley Computer Services Limited

Email address: [info@scsnet.uk](mailto:info@scsnet.uk)

Postal address: 25 Spring Lane, London, SE25 4SP

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

#### 1.4 CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 22<sup>th</sup> May 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## 1.5 THIRD-PARTY LINKS

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. The same applies to any links to third-party content that we send by email.

## 2. THE DATA WE COLLECT ABOUT YOU

Personal data is any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store, share and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, username or similar identifier and title.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.
- **Aggregated Data** includes statistical or demographic data for any purpose. It may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific feature on our website.
- **When visiting our website:**
  - **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
  - **Usage Data** includes information about how you use our website.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data), nor do we collect any information about criminal convictions and offences.

## 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise.
- **Automated technologies or interactions.** If you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this

personal data by using cookies, server logs and other similar technologies. Please see our cookie policy in paragraph 8 below for further details.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below
- Technical Data from the following parties:
  - (a) analytics providers such as Google based outside the EU;
  - (b) search information providers such as Google or Yahoo based inside or outside the EU.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Dunn & Bradstreet based inside the UK.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

#### **4. HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. This means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- Where we need to comply with a legal or regulatory obligation.
- Where you have given your consent to us to process your personal data.

#### **5. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please *Contact us* if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including:  (a) Manage payments, fees and charges  (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation

To deliver relevant website content	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

## 6. MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us and, in each case, you have not opted out of receiving that marketing.

## **7. OPTING OUT**

You can ask us to stop sending you marketing messages at any time by *Contacting us* at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

## **8. COOKIES**

Cookies are small text files - containing letters and numbers - which are downloaded by your computer when you access and use certain websites. Cookies allow our Website to recognise a device and provide content accordingly. We recommend that you accept all cookies from our Website, as they have been designed to enhance the service that this Website provides you.

If you choose to disable any of these cookies, then you may impair the functionality of the Website and you may not experience all its features in the way it was designed to be enjoyed. To disable cookies, we suggest that you set your browser to disable cookies for [www.scsnet.uk](http://www.scsnet.uk). This option usually appears under "Tools" or "Settings" in a section called "Privacy" and is intuitive. Browsers implement this feature differently, so please refer to your browser help section for detailed information. Or, search the internet for "Disabling cookies with X browser" where X is your browser name.

For more information about cookies and how they are used on the internet, please see the information on the independent All About Cookies site and the Wikipedia article on HTTP Cookies.

### *Google Analytics cookies used on our website*

Google Analytics is a free service provided by Google that uses several cookies. The cookies set by Google Analytics are used to help us gather information about how this website is used by visitors. The information is not personally identifiable and is simply used to track and improve the level of service our Website is providing. More information on the cookies that are set through our use of Google Analytics can be found on Google's Cookies & Google Analytics page. If you wish to disable these cookies, please use the opt-out browser add-on supplied by Google. Or you can set your browser to reject all or certain cookies. Disabling cookies set by Google Analytics will not reduce the service provided to you.

### *Session and load balancer cookies used on our website*

Our Website may use a 'load balancer' to store an identifier on your browser to help keep you connected to the same web server throughout your visit (for a smoother browsing experience). Similarly, session cookies contain no personally identifiable information, but enable our individual web servers to keep track of your progress throughout your visit. They expire as soon as you leave our Website.

## 9. CHANGE OF PURPOSE

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. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please *Contact us*. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 10. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:

- **External Third Parties:** service providers, partners and sub-contractors based in the EU or Worldwide, professional advisers (e.g. lawyers, bankers, auditors and insurers based in the EU).
- **Third parties** to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- **Other parties** such as HM Revenue & Customs and law enforcement agencies where we are under a duty to comply with a legal obligation, or to protect our rights, or to protect the rights, property or safety of SCS, our customers or others.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 11. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (**EEA**).

## 12. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### 13. DATA RETENTION - HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### 14. YOUR LEGAL RIGHTS

Under certain circumstances, you have right to:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing

purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please *Contact us*.

*No Fee Usually Required.* 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.

*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.

*Time Limit to respond.* We will respond to all legitimate requests within one month.