

## **PRIVACY NOTICE**

This Privacy Notice applies to personal information submitted to and collected by Corporate IT Systems Ltd. By submitting your personal information, you signify your agreement to this Privacy Notice.

Corporate IT Systems Ltd, (company registration number 05392558) is a 'data controller' for the purposes of your personal data. This means that we determine the purpose and means of the processing of your personal data.

This privacy contains important information on who we are, what personal data, (information), we hold about you, how we collect it and how we may use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or make a complaint. We may update this notice from time to time. Where a change is significant, we will use reasonable endeavours to notify you of the change in advance.

#### Who We Are and How to Contact Us

You can contact us at any time through <a href="mailto:info@CITSL.net">info@CITSL.net</a>

Our Head Office is:

Arena Business Centre,
Unit A2,
Holyrood Close,
Poole,
Dorset, BH17 7FJ UK Tel: +44 (0)1225 685160

We hope that we can resolve any query or concern you may raise about our use of your personal data. 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).

# Personal Data

Personal data that we collect from you may include data such as first name, surname, email address, IP address, job role and contact information along with any personally identifiable content in support requests.

### Special Categories of Personal Data

We do not collect any Special Categories of Personal Data about you, (this would include 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.

### Aggregated Data

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data 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.

#### **How We Collect Your Personal Data**

When you visit our website or use our support services, we collect personal data. The ways we collect it can be broadly categorised into the following:

- Provided directly by you for example by completing our website contact form, applying for a job and contacting us directly via phone, email or via our support system.
- Data collected automatically our main website page will collect information such as IP address, number of times you have visited, referring URL, browsing system and what links you clicked on. This enables us to get a better understanding of visitor areas of interest, so we can develop content where appropriate. Cookies are not used on our main website page.
- Information we get from other parties We might seek to find out more about someone from publicly available sources such as Google searches. We use this information to better personalise our services.
- Information added by customers a customer may add personal data into our support system in order to use the IT support service. For contractual obligations we keep audit logs and histories of work completed. Our support system will record personal information such as names, addresses, email addresses, passwords and telephone numbers. Cookies are used in our support system – please see the cookie notice below.

### **Cookie Notice**

A cookie is a small text file that is placed on your computer or device when you use our support system. We do not use cookies on our website. Cookies help us deliver our services and enable us to optimise our approach to meet your needs. Cookies cannot be used as code to deliver malware or viruses to your computer.

If you do not feel comfortable having sites use cookies to gather information, you can usually disable cookie collection in your browser settings. However, you should know that certain essential cookies may be necessary in order to provide you with certain features of our support system, so if you deactivate them your service will not work as intended.

#### How We Share Your Personal Data

No third-party providers have access to your data, unless specifically required by law. We may be required to share your data with law enforcement, government agencies, courts or regulators in order to comply with applicable laws. Where allowed, we will notify you of this type of disclosure. Your data may also be shared

with a potential acquirer or investor in our company and any other people where we have your consent. Usually, information will be anonymised, but this may not always be possible.

#### Lawful Basis for Use of Your Personal Data

Under UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing your information are

- Where we need to \*perform the contract we are about to enter or have entered into with you.
- Where it is necessary for our \*legitimate interests. A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.
- Where we need to comply with a \*legal or regulatory obligation.
- Where you have given your consent. You have the right to withdraw consent or opt out at any time. You can do this by contacting our Data Controller, Sarah Griffiths <a href="mailto:sarah@citsl.net">sarah@citsl.net</a>, or using the relevant mechanism provided in the communication at the time e.g. 'do not contact' response in a specific email sent by one of our staff. Once opted out a minimal amount of data will be held in a suppression/do not contact list so that we avoid any future contact.

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 receive an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact our Data Controller, Sarah Griffiths <a href="mailto:sarah@citsl.net">sarah@citsl.net</a>.

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.

#### **Data Retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it. Following that period, we will make sure it is deleted or anonymised. We will not retain your data for longer than necessary for the purposes set out in this notice. Different retention periods apply for different types of personal data.

Any personal data held by us for service update notifications and marketing will be kept by us until such time that you notify us that you no longer wish to receive this information.

In some circumstances you can ask us to delete your data and request erasure as one of your legal rights, as set out below.

## Your Legal Rights

You have legal rights for your personal data and in summary these are:

 Request access to your personal data - Commonly known as a Data Subject Access Request. The right to be provided with a copy of your personal data.

- **Request correction of your personal data** The right to require us to correct any mistakes in your personal data.
- **Right to be forgotten** In certain situations, the right to require us to delete your personal data.
- **Right to restrict processing** In certain situations, the right to require us to restrict processing of your personal data.
- Request transfer of your personal data (Data portability) In certain situations, the right to ask us to transfer any personal data that you have provided to us to another organisation.
- Right to withdraw consent at any time The right to object at any time to your personal data being processed for direct marketing and in certain other situations to our continued processing of your personal data. You can do this by contacting our Data Controller, Sarah Griffiths <a href="mailto:sarah@citsl.net">sarah@citsl.net</a>, or using the relevant mechanism provided in the communication at the time e.g. 'do not contact' response in a specific email sent by one of our staff. Once opted out a minimal amount of data will be held in a suppression/do not contact list so that we avoid any future contact.

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

**International Transfer of Data** - we do not transfer personal data outside the UK and only receive personal data from outside the UK directly from customers.





