



CORPORATE IT
SYSTEMS LTD

Privacy Policy

Registered Address 38 Ashley Road, Poole, Dorset, BH14 9BN

Tel 01225 685160 **Web** www.citsl.net **Email** support@citsl.net

Company Registration No. 05392558

VAT Reg No. 943 6888 71





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1 About this policy

We take your privacy seriously and we respect your privacy and data protection rights. This privacy notice aims to give you information on how we collect and process your personal data through your use of our websites, mobile apps and our services, including any data you may provide through our websites, mobile apps and our services

2 Contact Details

Address: 38 Ashley Road, Poole, Dorset, BH14 9BN
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You have the right to make a complaint at any time to the ICO (Information Commissioners Office) who are the supervisory authority for data protection issues in the UK (Tel: 03031231113 or www.ico.org.uk/concerns) but we appreciate the opportunity of resolving these with you directly in the first instance so please send us an email if you have any concerns.

2 Changes to this Privacy Notice and Changes to Your Details

We will need to update this privacy notice from time to time as the law and/or our business changes and develops. We will endeavour to tell you in advance by sending a service message to you if we hold your email address. Otherwise, please look out for the flags on our websites and materials that indicates we have changed this privacy notice. If you continue to use our websites and/or services after we have changed our privacy notice, we will take this as an indication that you accept the changes.

3 Third Party Links

Our websites, mobile apps and/or the service do not 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 cannot control these third-party websites and so do not allow them.

When you leave our website, mobile app and/or service, we encourage you to read the privacy notice of every website, plug-in and/or application that you visit.





4 The Data Covered by GDPR

i. Personal Data

Personal data means 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). This can include:

- Identity Data: including your name, username (or similar unique identification numbers that we may apply to you), email address, marital status, title, date of birth and gender.
- Contact Data: including your billing address, delivery address, email address and telephone number(s).
- Financial Data: including payment card details.
- Transaction Data: including the details of the products and services purchased and the date, time and location of sale and your purchasing activity.
- Technical Data: including information we collect through your use of our websites and mobile apps, where you came to our website from and where you went when you left our website, how often you visit and use our websites and mobile apps, technical information about the devices you use to access our websites and mobile apps (including your device's unique identifying codes (e.g. its "MAC" address), relevant IP address, operating system and version, web browser and version, and geographic location).
- Profile Data: including your username and password, purchases, orders or bookings made by you, your interests, your preferences, your feedback, your survey responses, your social media content (where this is in the public domain including posts and comments, pictures and video footage) and profile information and insight from organisations that already hold information on you (such as credit reference agencies and 'customer insight companies' who give us their views on your household, your status, as well as your possible preferences and behaviours).
- Usage Data: including information about how you use our website, mobile apps, products and services
- Marketing and Communications Data: including your preferences in receiving marketing materials, your communication preferences and information on what you view, click on and access in and through marketing emails, text messages and potentially push notifications.
- Sensitive Data: including information about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, and information about your health and genetic and biometric data (see section 4.2).





- 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. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

ii. What Personal Data do we process?

- Identity Data: your name, username (or similar unique identification numbers that we may apply to you), email address
- Contact Data: your email address and telephone number(s).
- Technical Data: information we collect through your use of our websites and mobile apps, where you came to our website from and where you went when you left our website, how often you visit and use our websites and mobile apps, technical information about the devices you use to access our websites and mobile apps (including your device's unique identifying codes (e.g. its "MAC" address), relevant IP address, operating system and version, web browser and version, and geographic location).
- Profile Data: your username and password
- Usage Data: including information about how you use our website, mobile apps, products and services
- Sensitive Data: including information about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, and information about your health and genetic and biometric data (see section 4.2).
- Aggregated Data

We only collect and process Personal Data where you provide such information to us in the following situations:

- As part of any feedback and/or complaints which you raise with us, for example where you believe we have been discriminatory against you (for example, discrimination based on race or sexual orientation). When you provide details of what happened, this may include giving us Sensitive Data. We are allowed to process this Sensitive Data (together with any other relevant information), to investigate, address and resolve your issue and to administer any possible legal claims or out-of-court procedures.
- Where you are applying for a job with us. In this situation, we can process your Sensitive Data because it is necessary for carrying out our obligations and rights related to employment law and your working capacity; this is covered in a separate Data Privacy Policy which is displayed when you apply for job, and a copy of it can be

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provided by emailing us. We do not routinely collect and process Sensitive Data in any other situations. If we do, we will obtain your explicit consent.

iii. Sensitive Data

Under data protection law this is known as "special category" data and includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, and information about your health and genetic and biometric data.

iv. When do we process Sensitive Data?

We only collect and process Sensitive Data where you provide such information to us in the following situations:

- As part of any feedback and/or complaints which you raise with us, for example where you believe we have been discriminatory against you (for example, discrimination based on race or sexual orientation). When you provide details of what happened, this may include giving us Sensitive Data. We are allowed to process this Sensitive Data (together with any other relevant information), to investigate, address and resolve your issue and to administer any possible legal claims or out-of-court procedures.
- Where you are applying for a job with us. In this situation, we can process your Sensitive Data because it is necessary for carrying out our obligations and rights related to employment law and your working capacity; this is covered in a separate Data Privacy Policy which is displayed when you apply for job, and a copy of it can be provided by emailing us. We do not routinely collect and process Sensitive Data in any other situations. If we do, we will obtain your explicit consent.

5 Profiling

We do not process Special Category or Personal Data for profiling purposes.

6 How We Collect Your Personal Data

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

- Direct Interactions: you may give us your Identity, Contact, Financial, Profile and Marketing and Communications Data by filling in forms or by corresponding with us by post, phone, email, social media or otherwise. This includes personal data you provide when you purchase our products or services or give us feedback.
- Automated Technologies: as you interact with our website and our services, 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.
- Other Third Parties or Publicly Available Sources: we may receive personal data about you from various third parties and public sources as set out below:

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- Technical Data from analytics providers such as Google, advertising networks search information providers.

7 How We Process Your Personal Data

We only process your personal data when allowed to do so by law. Most commonly, we will process your personal data:

- With your consent and please note that you have the right to withdraw your consent at any time by contacting us.
- Where we need to perform a 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.
- Where we need to comply with a legal or regulatory obligation.

8 How we share your personal data

We cannot run our business or provide many of the services and benefits you expect to receive without involving other people and businesses. We only share your information in accordance with the laws applicable to us and for the agreed purpose.

We may share your personal data with:

- Our professional advisors (acting as controllers or processors); for example, our lawyers, insurers and brokers when they need it to provide advice to us.
- The Police, the Health and Safety Executive, local authorities, Her Majesty's Revenue and Customs (HMRC), the Courts and any other central or local government bodies (acting as controllers or processors) where we are required to do so to comply with our legal obligations, or where they request it and we may lawfully disclose it, for example for the prevention and detection of crime or to report serious health and safety incidents.
- We also may share the information we collect with other third parties where we are legally obliged to do so; for example, to comply with a court order.

We do not share your personal data with:

- Another Group including new companies, brands or any New business partners.
- Service providers
- Affiliated third parties
- Rewards companies

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9 How We Keep Your Personal Data Secure

We take the security of your personal data very seriously and have in place appropriate security measures at all times, especially where we have to share your information (as outlined in section 7) to protect your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have also 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.

Please take care of your own information. For security tips and tricks when using the internet, Wi-Fi and smartphones or tablets, please visit www.getsafeonline.org.

10 Our Retention of Your Personal Data

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

The precise length of time we hold your personal data for varies depending on the individual circumstances, but in determining 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.

We regularly review our retention periods to ensure that we are not keeping your data for longer than necessary. Details of retention periods for different aspects of your personal data are available by contacting us.

11 Your Rights

In certain circumstances, you may have the right to request access, transfer, rectification and/or erasure of the personal data that we process about you. You may also have the right to object to and/or restrict our processing of your personal data. Details of the rights are set out below.

- **Human intervention:** you may request human intervention where a decision has been made about you based solely on automated processing, and/or you may challenge that decision (this may happen in the context of our recruitment process where we collect information relating to whether or not a candidate has unspent criminal convictions).
- **Access:** you may request access to your personal data, which enables you to receive a copy of the personal data that we hold about you and to check to see if we are processing it lawfully.
- **Transfer:** you may request that we transfer your personal data to you or 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. Please 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.
- **Rectification:** you may request rectification 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.

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- **Erasure:** you may request erasure of the personal data that we hold about you. 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:** you may object to how we are processing 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.
- **Restriction:** you may request that we restrict how we process 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.
- **Withdrawal of Consent:** where we have relied on your consent to process your personal data you will have the right to withdraw your consent at any time. 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.

To exercise any of these rights please contact us using the details in section 2.

The ICO regulates most UK data and information laws. To learn more about your rights, visit the ICO website at www.ico.org.uk.

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12 Document Version Control – change log

This document is to be reviewed annually

Version	Date of change	Edited by	Summary of changes
0.1	24.05.2018	L.Kilbey	Initial Draft for review
1.0	24.05.2018	D.Witherington	Final

