# **Privacy Policy**

# How we use your information

This privacy policy tells you what to expect when Support Services (Newcastle) Limited (SSNL) collects and uses your personal information.

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# How we use your data (Lawful basis)

We use two lawful bases for processing of personal data as detailed below;

1. Contract basis for lawful processing is used for personal information which directly relates to purchases (ie contract of sale) and to the management of support or consultancy contracts for our customers and our former customers.

Whilst you are a customer we need to store and process certain personal data, such as your name, address, email address, telephone number and your payment details. We are required by law to hold accounting information for approx. 7 years (6 years from the end of the last financial year), but any other information that is not required to be kept by law can be erased from our systems.

When you become a customer of SSNL it is necessary for us to share your personal data with some 3rd-party data processors (other companies), as outlined below in the section below entitled "People who use SSNL's services"

Under the Contract basis of lawful processing you are entitled to the right to be forgotten (erased from our systems) and the right to ask us to transfer the personal data that you supplied us with to another company. Please see the contact information at the bottom of this page if you wish to make such a request.

2. Consent basis is used when you choose to opt in to receive our direct marketing such as, but not limited to, email newsletters, promotions and events. This use of personal data applies to both customers and non-customers and is usually restricted to just your name, address, email address and telephone number.

You may opt out of receiving our newsletters and marketing at any time, whether a current customer or not. If you wish to opt out from direct marketing you will be able to do so via an unsubscribe link included in each marketing email or you can contact us using the information at the bottom of this page.

Because of the nature of our work you may be required to, on a case by case basis, consent for us to process sensitive personal information such as CCTV images or recordings and passwords to access the equipment we are working on. If we need to keep a copy of any sensitive information it will only be for an agreed length of time and for the agreed purpose before being securely erased from our systems, unless we are required by law to keep a copy for longer.

Under the Consent basis of lawful processing you are entitled to the right to be forgotten (erased from our systems) and the right to ask us to transfer the personal data that you supplied us to another company. Please see the contact information at the bottom of this page if you wish to make such a request.

Marketing: We will not sell or pass your details to any 3rd-parties for marketing purposes, we respect your privacy. You will not be automatically opted in to any marketing campaigns that we run. If you would like to opt in to receive our newsletters, promotions and to hear about upcoming events then please let us know using by either emailing us at info@SSNL.com or by using the email opt in link on our website. (You can unsubscribe at any time).

## Visitors to our websites

When someone visits ssnl.co.uk we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website for legitimate purposes. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

#### Terms and conditions of website use

The content of the pages of this website is for your general information and use and is subject to change without notice. Your use of any information or materials on this website is entirely at your own risk, for which we shall not be liable, and it shall be your own responsibility to ensure that any products, services or information available through this website meet your specific requirements. This website contains material which is owned by or licensed to us. This material includes, but is not limited to, the design, layout, look, appearance and graphics. Reproduction is prohibited other than in accordance with 'fair

use' as set out by the Digital Millennium Copyright Act (DMCA). Unauthorised use of this website may give rise to a claim for damages and/or be a criminal offence.

# Use of cookies by SSNL

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. The SSNL website uses cookies for Google Analytics purposes and to keep track of logged in users. No personally identifiable information is collected via our cookies.

# **Security and performance**

The SSNL website uses an integrated application to help maintain the security and performance of the website. To deliver this service it processes the IP addresses of visitors to our website and logs and blocks any IP addresses that make unauthorised attempts to log in or that try to examine the non-public content.

## People who contact us via social media

Interaction with us via social media means that you will be creating information such as sending direct messages, mentions, comments and likes this data is processed and retained by the social media network themselves, as defined within their own privacy policies. We may from time to time use a third-party provider, such as Hootsuite, to manage our social media interactions. If you send us a private or direct message via social media the message will be stored by Hootsuite for up to twelve months.

# People who email us

Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

We use SSL/TLS encrypted email between our email applications and email servers, please ensure that your email application also uses SSL/TLS to ensure end-to-end privacy of any data being sent. For more sensitive data we can send and receive information using PGP encrypted email, ask us for more information on how to use PGP encryption.

# People who make a complaint to us

When we receive a complaint from a person we create a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We may at times compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a

complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

# People who use SSNL's services

SSNL offers various services to our customers. We have to hold the details of the people who have requested our services in order to provide it to them. However, we only use these details to provide the service the person has requested and for other closely related purposes. For example, we might use information about people who have requested a service to carry out a survey to find out if they are happy with the level of service they received.

SSNL uses software from third-party data processors to manage projects, accounts and to process payments. These data processing companies are, where appropriate, GDPR, PECR and or PCI-DSS compliant. They include our billing and accounting system, Quickfile and cloud storage services such as Dropbox. Further information on these companies can be found on their websites or supplied by us upon request.

Additionally, should payments fall past due we may have to pass your name, contact details, payment and account information to a 3rd-party debt collection company. Your personal data would be shared with an actual or potential buyer (and its agents and advisers) in connection with an actual or proposed purchase, merger or acquisition of any part of our business.

## People who may be recorded by our CCTV system

SSNL utilises CCTV cameras within our premises and on the perimeter areas adjacent to our premises to protect clients, employees, property and visitors. Video is recorded on a central CCTV system and is stored for up to 90 days after which time it is automatically overwritten. Should the need arise, copies of recordings may need to be given to the authorities to aid in any investigation – this will be done within the guidelines issued by the Information Commissioners Office.

# Job applicants, current and former SSNL employees

When individuals apply to work at SSNL, we will only use the information they supply to us to process their application and to monitor recruitment statistics. Where we want to disclose information to a third party, for example where we want to take up a reference or obtain a 'disclosure' from the Criminal Records Bureau we will not do so without informing them beforehand unless the disclosure is required by law.

Personal information about unsuccessful candidates will be held for up to 12 months after the recruitment exercise has been completed, it will then be destroyed or deleted. We retain de-personalised statistical information about applicants to help inform our recruitment activities, but no individuals are identifiable from that data.

Once a person has taken up employment with SSNL, we will compile a file relating to their employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to that person's employment. Once their employment with SSNL has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete it.

# **Complaints or queries**

SSNL tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of SSNL's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

Should you feel that we have handled your personal data incorrectly or that we haven't been able to provide a suitable answer to your query about the data we hold for you, then you can make a complaint to the ICO at www.ico.org.uk quoting our company registration reference of ZA265583

## Access to personal information

SSNL tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a GDPR 'subject access request' using the contact details at the bottom of this page. We are legally obliged to provide such information within 30 days of your request free of charge, but where a request is manifestly unfounded or excessive we may charge a reasonable fee for the administrative costs of complying with the request. We may also charge a reasonable fee if an individual requests further copies of their data following a request, based on the administrative costs of providing further copies.

If we do hold information about you we will: give you a description of it; tell you why we are holding it; tell you who it could be disclosed to; and let you have a copy of the information in an intelligible form.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting us at the address provided below.

## Disclosure of personal information

In most circumstances, we will not disclose personal data without consent. However, when we investigate a complaint, for example, we will need to share personal information with the persons or organisation concerned and with other relevant bodies.

# You can also get further information on:

agreements we have with other organisations for sharing information;

circumstances where we can pass on personal data without consent for example, to prevent and detect crime and to produce anonymised statistics;

our instructions to staff on how to collect, use and delete personal data; and how we check that the information we hold is accurate and up to date.

#### Links to other websites

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

# Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was first published on 30th May 2018.

#### Address and contact information

You can write to us at:

Support Services (Newcastle) Limited 4a Redburn House Redburn Road Newcastle upon Tyne NE5 1NB

Or email us at sales@ssnl.co.uk