



PRIVACY POLICY

COMPUTER RESPONSE LIMITED

WHAT IS THE GDPR?

The General Data Protection Regulation (GDPR) replaces the Data Protection Directive and was designed to harmonize data privacy laws across Europe, to protect and empower all EU citizens' data privacy and to reshape the way organisations across the region approach data privacy. It will become effective from the 25th May 2018. The GDPR applies not only to organisations who process data in the EU, but also any organization that offers goods or services to, or monitors the behavior of people inside the EU. GDPR applies even if the processing takes place outside of the EU. After Britain leaves the European Union, a new UK Data Protection Act will ensure that the GDPR principles remain in UK law.

The GDPR applies to information that directly or indirectly could identify an individual. This includes information, such as names, addresses, phone numbers, date of birth, as well as IP addresses, cookie identifiers, device information, advertising identifiers, financial information, geo-location information, social media information, consumer preferences, etc. Personal data is data that relates to an identified or identifiable individual and is:

- processed electronically
- kept in a filing system
- part of an accessible record
- held by a public authority.

This includes data that does not name an individual but could potentially identify them.

WHO WE ARE

Computer Response Limited ('we' or 'us' or 'our') gather and process your personal information in accordance with this privacy policy and in compliance with the relevant data protection regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

Computer Response Limited registered office is at **Response House, Foundry Street, Chesterfield, Derbyshire, S41 9AU** and we are a company registered in England and Wales under company number **3683863**. We are registered on the Information Commissioner's Office Register; registration number **Z6862285**, and act as the data controller when processing your data. Our designated Data Protection Officer is Linda Allen, Finance Director, who can be contacted at linda@computer-response.com.

HOW DO WE COLLECT INFORMATION FROM OUR CUSTOMERS?

Computer Response Limited processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice. We obtain information about our customers, when they contact Computer Response Ltd, either in person, over the telephone or via email about products and services.

We also hold video information from CCTV recording systems deployed at our premises for security and safety reasons, for more information please request a copy of our CCTV Policy.

WHAT TYPE OF INFORMATION IS COLLECTED FROM OUR CUSTOMERS?

The customer information we collect might include:

- Name,
- Address,

- Telephone number,
- Fax number,
- Email address,
- Company's name,
- Job Title,
- Work details - company address, email address, telephone number, e.g.
- Usernames and passwords,
- Name/Signature when tracking a delivery.

We collect your personal data in the performance of a contract or to provide a service and to ensure that orders are completed and can be sent out to your preferred address. We will occasionally send you marketing information where we have assessed that it is beneficial to you as a customer and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests

HOW IS YOUR INFORMATION USED?

We may use a customer's personal information to:

- carry out services as requested;
- process orders for goods that have been submitted;
- carry out our obligations arising from any contracts entered into;
- collect trade references;
- conduct credit checks;
- recover debts;
- notify changes to our products/services;
- notify changes to our terms and conditions;
- seek views or comments on the services we provide;
- send communications which have been requested or which may be of interest.

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations (for example: copy sales receipts and invoices). We will hold a customer's personal information on our systems whilst their account is active, or as long as is set out in any relevant contract a customer holds with us.

We will not contact our customers for marketing purposes by email, phone or text message unless they have given prior consent. We will not contact customers for marketing purposes by post if they have indicated that they do not wish to be contacted. A customer can change their marketing preferences at any time by contacting us by email: debbie@computer-response.com.

YOUR RIGHTS

You have the right to access or request a copy of any personal information that Computer Response Limited hold or process about you and to request information about:

- What personal data we hold about you?
- The purposes of the processing.
- The categories of personal data concerned.
- The recipients to whom the personal data has/will be disclosed.
- How long we intend to store your personal data for?
- If we did not collect the data directly from you, information about the source.

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified. The accuracy of the information we hold is important to us. We are working on ways to make it easier for customers to review and correct the information that we hold about them. In the meantime, if any of the information we hold is inaccurate or out of date, please email us at: debbie@computer-response.com.

You also have the right to request erasure of your personal data or to restrict processing (where applicable) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-

making we may use. After it is no longer necessary for us to retain your personal information, we will dispose of it in a secure manner according to our Information Security Policy and Confidentiality Policy (copies are available on request).

Any requests from you to exercise any of the above rights must be in writing and proof of identification is required to ensure that your data is protected and kept secure. We will provide you with a copy of your personal information in a structured, commonly used and machine readable format on request.

WHO HAS ACCESS TO OUR CUSTOMER'S INFORMATION?

We will not sell or rent a customer's information to third parties. We will not share information with third parties for marketing purposes.

Third Party Service Providers working on our behalf: We may pass a customer's information to our third party service providers, subcontractors and other associated organisations for the purposes of completing tasks and providing services as requested, e.g. arranging broadband or domain names; arranging a delivery with a courier. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service.

Other Third Parties: includes the police, law enforcement agencies, credit reference and fraud prevention agencies and other bodies to protect our or another person's rights, property, or safety e.g. to exchange information to protect against fraud and to reduce payment risks; in connection with the prevention and detection of crime.

Please be reassured that we will not release a customer's information to third parties unless a customer has requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime. All processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy policy, the data protection laws and any other appropriate confidentiality and security measures.

CUSTOMER REFERRALS

If one of our customers gives us personal information about someone else, they must do so only with that person's authorization. Our customer should inform any referrals of how we collect, use, disclose, and retain their personal information according to our Privacy Policy.

SAFEGUARDING MEASURES IN PLACE TO PROTECT THE LOSS, MISUSE OR ALTERATION OF INFORMATION?

Computer Response Limited takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including, but not limited to:

- SSL encryption,
- Pseudonymisation,
- Restricted access,
- IT authentication,
- Firewalls,
- Anti-virus/malware.

When a customer gives us personal information, we take steps to ensure that it is treated securely. Any sensitive information (such as usernames and passwords) kept electronically is encrypted and password protected. Any paper-based sensitive information will be kept in files in lockable filing cabinet drawers. Non-sensitive details (email addresses, etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect personal information, we cannot guarantee the security of any information a customer transmits to us, and they do so at their own risk. Once we receive personal information, we make our best effort to ensure it is secure on our systems.

CONSEQUENCES OF NOT PROVIDING YOUR DATA

You are not obligated to provide your personal information to Computer Response Limited, however, as this information is required for us to provide you with our services, deliver your products, we will not be able to offer all of our services without it.

HOW LONG DO WE KEEP YOUR DATA?

Computer Response Limited only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your

basic personal data (name, address, contact details) for a minimum of 6 years after which time it will be destroyed. Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

MAKING A COMPLAINT

Computer Response Limited only processes your personal information in compliance with this privacy policy and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the Information Commissioner's Office who is the supervisory authority. Their contact details are: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF; Telephone: 0303 123 1113; Email: registration@ico.org.uk.

OUR WEBSITE

The only page on the Computer Response Ltd website - www.computer-response.com which requires inputting of personal information is the Client Feedback form – Name and Email, this information will only be used for reply purposes. If a customer emails Computer Response Ltd from our Contact Us page, we will only use their email address for reply purposes. Our website may include links to other sites. While we will make every effort to provide links to high quality, reputable sites, we are not responsible for their privacy practices, site content, or the services they offer, this Privacy Policy applies only to our website, so we encourage reading the privacy statements on the other websites visited. In addition, any links to our website from third party sites, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

COOKIE NOTICE

A 'cookie' is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. When you visit a site that uses cookies for the first time, a cookie is downloaded onto your computer/mobile device so that the next time you visit that site, your device will remember useful information such as visited pages or logging in options. Cookies cannot harm your computer. They are not computer programs, and they cannot be used to spread computer viruses, obtain email information or obtain credit card details. Cookies are widely used in order to make websites work, or to work more efficiently. Most web browsers allow some control to restrict or block cookies through the browser settings, however if you disable cookies you may find this affects your ability to use certain parts of our website or services. For more information about cookies visit www.aboutcookies.org.

CREDIT CARD/DEBIT CARD INFORMATION

The Payment Card Industry requirements apply to all systems that store, process, or transmit cardholder data. Currently, Computer Response Limited's cardholder environment consists only of a stand-alone dial-out terminal, which was updated to the latest compliant model on the 18th April 2017. Electronic storage of cardholder data is not conducted or permitted. All customer copy receipts will be passed back to the cardholder with their card and the merchant copy receipts passed to the accounts department for safe storage in the appropriate sales lever arch file. Should Computer Response Ltd implement additional acceptance channels, begin storing, processing, or transmitting cardholder data in electronic format, or otherwise become ineligible to validate compliance it will be the responsibility of Computer Response Limited Directors to determine the appropriate compliance criteria and implement additional policies and controls as needed. For more details please see our Credit Card Security Policy.

REVIEW OF THIS POLICY

We keep this Policy under regular review. This Policy was last updated in May 2018.

HOW TO CONTACT US

For requests, complaints or queries relating to the use of your personal information please contact our Data Protection Officer: Linda Allen, Data Protection Officer, Computer Response Ltd, Foundry Street, Chesterfield, S41 9AU. Tel: 01246 450502. Email: linda@computer-response.com