

PRIVACY NOTICE

DOCUMENT CONTROL

Issue No: 1

Issue Date: May 2018

Background

CTech IT Solutions understands that your privacy is important and that you care about how your personal data is used. We respect and value the privacy of all our clients and partners and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Who we are?

Business Name: CTech IT Solutions Ltd.
(registered in England and Wales no: 10676465)
Registered Address: 32 Fleming Way, Tonbridge, Kent, TN10 4RU
VAT Number: 266 1267 00

Our Data Protection Team can be contacted directly here by email support@ctechit.co.uk or by telephone +44(0)1732 252258.

CTech IT Solutions provides its services which includes consultancy, IT management and monitoring solutions such as network, systems and database management, security solutions, applications and infrastructure monitoring, wireless, hosting and IT support - to business clients using not only its own services but its partners and vendors. CTech IT Solutions in some cases is a Data Processor as well as a Data Controller.

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers. The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.

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- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. What Personal Data Do You Collect?

As a provider of Managed and Hosted Services, we may receive, process or store certain information, including personal data, on behalf of our clients. All such information ("Client Data") is owned and controlled by our clients, who are the data controllers for such information with respect to EU data protection law. Client Data may include information from end points and other systems, tools or devices that we or our clients manage or monitor, and end user data related to an individual's activities on a client's network and systems. It may also include event logs, end user information (such as IP address, email address, username and computer name), and other data where relevant to a support or service request. CTech IT Solutions is a data processor for Client Data. This means that CTech IT Solutions processes Client Data on the basis of instructions from our clients. If CTech IT Solutions receives a data request, it may redirect this request to its client, as the client is the controller of the client data.

Data Relating to Our Clients and Users of Managed Services and Sites

CTech IT Solutions collects information as part of its normal business operations and in the administration of its relationship with clients, which may include personal data.

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Business Contact and Customer Relationship Management

We collect and maintain information about our clients, which may include company name, business contact name and title, phone number, email and other contact details. We may also collect billing address, financial account, order details, subscription and license information, and usage details. In addition, we collect user credential and profile data (name, contact, authorised users) of Customer's authorised users and account administrators.

Data Submitted

In order to access or use certain portions of the Managed Services, to enjoy the full functionality of the Managed Services, or to conduct or seek to conduct business with us, you may be prompted to provide certain personal data to us, including in the following ways:

- by filling in forms (for example, a "Contact us" form) on our website or anywhere else we conduct business;
- by downloading or accessing the Managed Service products;
- by subscribing to newsletters or other communications; or
- by corresponding with us by phone, e-mail, chat or otherwise using our contact details.

Typically, the personal data you give us may include name, business affiliation, business address, telephone number, and email address, and any personal details required to resolve any enquiries or complaints.

Third Parties

We may also obtain personal data about clients from third parties, such as LinkedIn, Facebook and other publicly accessible sources.

Customer Support and Service

When clients contact us for support or other customer service requests, we maintain support tickets and other records related to the requests, including any information provided by clients related to such support or service requests. We may also collect call recordings related to support and customer service-related calls.

Usage Details

We collect information about clients' usage of our Managed Services, including IP address, Customer ID, email address, and other usage statistics. We do not collect usage details about Customer end users, except as necessary for support or to provide the services requested by Clients (in which case we are a data processor of such data).

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When you visit our website, our servers automatically collect certain browser or device generated information, which may in some cases constitute personal data, including but not limited to:

- your domain;
- your IP address;
- your date, time and duration of your visit;
- your browser type;
- your operating system;
- your page visits;
- information from third parties;
- other information about your computer or device; or
- internet traffic.

Other Data

CTech IT Solutions collects, uses and maintains certain data related to its business and the Services it provides to Clients, which is not personal data; this privacy notice does not restrict our use and processing of such data

6. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data will be used for the following purposes:

- Providing and managing your account.
- Supplying our products and services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products and services to you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email and post that you have opted-in to (you may unsubscribe or opt-out at any time by clicking the 'unsubscribe' link in CTech IT Solutions email marketing or by emailing support@ctechit.co.uk).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and telephone and text message and post with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

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7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. There is no fixed period that personal data is retained, the following factors will be used to determine how long it is kept.

Is it required to:

- Meet Contractual, legal and reporting requirements
- To perform and report on business operations and/or services supplied to you and/or your company by CTech IT Solutions
- Supplying you with information by email and post until you unsubscribe or opt-out
- To indicate that you have you unsubscribed or opted-out

8. How and Where Do You Store or Transfer My Personal Data?

We are committed to ensuring that your information is secure. To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure the information we collect. All information you provide to us is held on secure servers.

We will keep your personal data for as long as is necessary for the provision and administration of the relevant services or goods being provided.

9. Do You Share My Personal Data?

CTech IT Solutions may sometimes contract with third parties to supply products and/or services to you on our behalf. These may include payment processing, delivery, and marketing. In some cases, those third parties may require access to some or all of your personal data that we hold.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 8.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

CTech IT Solutions reserves the right to share any information that is not deemed personal data or is not otherwise subject to contractual restrictions.

10. How Can I Access My Personal Data?

You have the right to access information held about you. You can exercise your rights at any time by contacting us at: support@ctechit.co.uk.

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11. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Data Protection Team):

Email address: support@ctechit.co.uk

Telephone number: +44(0)1732 252258

Postal Address: CTech IT Solutions - Data Protection Team, 32 Fleming Way, Tonbridge, Kent, TN10 4RU

12. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection. We recommend you check back regularly to see any updates.