

# SERVER CENTRE HOSTING LIMITED

## PRIVACY POLICY & PROCEDURES

### Revision History

Version	Revision Date	Revised by	Note
V1.0	25-11-2017	Adam Heavens	Initial redraft of existing policy
V1.1	08-12-2017	Adam Heavens	New company logo added

### Document Control

<b>Document Owner:</b> Adam Heavens	<b>Document No:</b> GDPR003	<b>Status:</b> Approved	<b>Approved by:</b> GDPR Board
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## **1 POLICY STATEMENT**

**Server Centre Hosting Limited** (*hereinafter referred to as the “Company”*) are committed to our obligations under the regulatory system and in accordance with the GDPR and maintain a robust and structured program for compliance and monitoring.

Our Privacy Policy is available on our website and by other methods upon request. The Company defines a Privacy Policy as a document, form, webpage or pop-up that is provided to individuals at the time we collect their personal *data* (*or at the earliest possibility where that data is obtained indirectly*).

Our Privacy Policy includes the Article 13 (*where collected directly from individual*) or 14 (*where not collected directly*) requirements and provides individuals with all the necessary and legal information about how, why and when we process their data, along with their rights and obligations.

We have a link to our Privacy Policy on our website and provide a copy of physical and digital formats upon request. The Policy is the customer facing document that provides the legal information on how we handle, process and disclose personal information.

The notice is easily accessible, legible, jargon-free and is available in several formats, dependant on the method of data collection: -

- Via our website
- Worded in full in agreements, contracts, forms and other materials where data is collected in writing or face-to-face
- In employee contracts and recruitment materials

**Where we rely on consent to obtain and process personal information, we ensure that it is: -**

- Displayed clearly and prominently
- Asks individuals to positively opt-in
- Gives them sufficient information to make an informed choice
- Explains the different ways we will use their information
- Provides a clear and simple way for them to indicate they agree to different types of processing
- Where applicable includes a separate unticked opt-in box for direct marketing

## **2 PURPOSE**

The purpose of this policy is to provide the Company's intent, objectives and procedures regarding privacy involving personal information. As we have obligations under the GDPR, we also have a requirement to ensure that adequate procedures, controls and measures are in place. This policy details our processes for communicating, documenting and managing our Privacy Policy.

## **3 WHO WE ARE**

We 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. Server Centre Hosting Limited's registered office is at Red Lane Mill, Sunny Bank Mills, Leeds, LS28 5UJ and we are a company registered in England and Wales under company number 7240017. We are registered on the Information Commissioner's Office Register; registration number Z2524730 and act as the data controller and data processor when processing your data. Our designated Data Protection Officer is Adam Heavens, who can be contacted at the above address.

## **4 INFORMATION THAT WE COLLECT**

We process 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. Examples of the personal data that we might collect from you are: -

- Your Full Name
- Company Name
- Company address
- Email Address
- Contact Phone Numbers
- IP Address used when accessing our services
- Hosting Account user names and passwords
- SIP Addresses
- Job Title
- Department
- Unique Identifiers (i.e. Employee Number, Office Reference etc)
- Telephone conversations to our Support Team
- Live Chat messages (via website)

## 5 HOW WE USE YOUR PERSONAL DATA

We takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time. We collect your personal data in the performance of a contract and to provide you with the service you have requested.

## 6 YOUR RIGHTS

You have the right to access any personal information that Server Centre Hosting processes 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.

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.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

## **7 SHARING AND DISCLOSING YOUR PERSONAL INFORMATION**

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement.

## **8 SAFEGUARDING MEASURES**

We take 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, TLS, encryptions, pseudonymisation, restricted access, IT authentication, firewalls, anti-virus/malware etc..

## **9 TRANSFERS OUTSIDE THE EU**

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) but some other countries may not necessarily have the same high standard of protection for your personal data. Server Centre Hosting does not transfer or store any personal data outside the EU.

## **10 CONSEQUENCES OF NOT PROVIDING YOUR DATA**

You are not obligated to provide your personal information to Server Centre Hosting, however, as this information is required for us to provide you with our services, we will not be able to offer our services without it.

## **11 LEGITIMATE INTERESTS**

As noted in the *'How We Use Your Personal Data'* section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

## **12 HOW LONG WE KEEP YOUR DATA**

We only ever retain 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.

## **13 USE OF COOKIES**

We use Cookies. 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 items added in the shopping cart, visited pages or logging in options.

Cookies are widely used in order to make websites work, or to work more efficiently, and our site relies on cookies to optimise user experience and for features and services to function properly.

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 <https://www.aboutcookies.org>.

We use cookies to:

- Allow us to tailor content to match your preferred interest.
- Help us recognize visitors as unique visitors (just a number) when they return to our websites.
- Compile anonymous aggregated statistics that allow us to understand how users use our websites and help us improve the structure of our websites. We cannot identify visitors personally in this way.
- Count the number of anonymous user of our websites.

We gather this information for internal use only and we do not authorise the release of this information to anyone outside of Server Centre Hosting.

## **14 LODGING A COMPLAINT**

Server Centre Hosting only processes your personal information in compliance with this privacy notice 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 supervisory authority.

### **Server Centre Hosting Limited**

Adam Heavens - Data Protection Officer  
8 Red Lane Mill  
Sunny Bank Mills  
Leeds  
LS28 5UJ

### **Information Commissioner's Office**

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF