



## Data Privacy Notice

Your data and privacy are important and we will handle them securely, fairly and legally at all times. Combined IT Solutions Ltd complies fully with the General Data Protection Regulation (GDPR).

### What Information Do We Collect?

- We keep all the data that you provide us with when you agree to a service with us by email, phone or in person. This information is available on request. These include your name, address, e-mail, telephone number etc.
- We keep a record of all contacts with you via e-mail.
- We keep IP logs, duration and click while visiting our website.

### What Information Do We Not Collect?

- We don't see and therefore do not store or use your credit/debit card details.
- We regularly delete stored voicemails, faxes and text messages.

### Where We Keep Your Data - Security

The security of your personal data is very important to us. We have legal obligations to keep it safe and handle it with care and the penalties for not doing so are very high.

We store your personal data securely in our network and on secure cloud services so that it cannot be lost in the event of a catastrophic failure in our systems.

### How Do We Use Your Information?

The GDPR says that we are allowed to use and share your personal data only where we have a proper reason for doing so.

The permitted Legal Bases for processing are set out in article 6 of the GDPR. At least one of these must apply whenever we process your personal data:

**Consent:** you have given clear consent for us to process your personal data for a specific purpose (for example, marketing)

**Contract:** the processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract.

**Legal obligation:** the processing is necessary for us to comply with the law (not including contractual obligations).

**Vital interests:** the processing is necessary to protect someone's life.

**Public task:** the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.

**Legitimate interests:** the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect your personal data which overrides those legitimate interests.

Here is a list of the ways that we may use your personal information, and which of the Legal Bases outlined above we rely on to do so.

Business Function	Why we use your Personal Information	Our Reasons (Legal Basis)
IT Maintenance Contract	To supply you with a quick response time to issues concerned your IT infrastructure	Contract
Hardware/Software Orders	To supply you with networking equipment and accessories	Legitimate Interest
Customer Services	To provide you with customer services and technical support via phone, email, txt	Legitimate Interest
Service Notifications	Informing you of regulatory changes, service changes, maintenance periods etc	Legitimate Interest
Marketing	Informing you of new products, services and offers	Consent
Website Analytics	To obtain statistics on the usage of our website	Legitimate Interest

### Who We Share Your Information With And Why

Combined IT Solutions Ltd works with a number of trusted suppliers to provide the high-quality services you expect from us. All our suppliers have been carefully vetted and only the minimum personal data is shared in order to fulfil your orders or provide the services you have requested.

Your data may be shared with the following categories of third parties:

- Telecoms and broadband providers - So that we can provide you with access to our products and services
- Hardware suppliers and delivery companies - If you order networking equipment or accessories from us.
- Website analytics - We use Google Analytics to supply statistics on the usage of our website.
- We also have a legal obligation to share data in response to properly made requests from Law enforcement agencies for the prevention and detection of a crime, for the

purpose of safeguarding national security or when the law requires us to, such as in response to a court order or other lawful demand or powers contained in legislation.

- Regulatory bodies such as the Information Commissioner's Office and Ofcom.

### How Long Do We Keep Your Personal Data?

We keep your data while you have an account with us, and sometimes for a longer period, depending on whether there are legal or regulatory reasons for doing so.

Contact details, account details and payment history must be retained for seven years.

We have a legal obligation to keep your communications data for 12 months. This includes the number calling, the number called and the time, date and duration of the call, text or fax. Law enforcement agencies have the right to access this data to support the investigation and prosecution of serious crime.

We do not keep the content of phone calls.

The contents of fax and text messages are deleted after 30 days. Voicemail messages are automatically deleted after 12 months.

### Transfers To Third Countries

At Combined IT Solutions Ltd your data is stored in our secure data centres which are located in the United Kingdom. Your information will not be transferred to a third country (defined under the GDPR as a country outside of the European Economic Area).

### Keeping In Touch With You

We want to keep you updated about our new products, services and any special offers that may become available. We promise to never share your personal information with any third-party marketing company.

You can opt-in or opt-out of receiving these messages at any time using the 'unsubscribe' link contained in our marketing emails.

### What Are Your Rights?

You have the following rights under the GDPR:

The right to be informed. Individuals have the right to be informed about the collection and use of their personal data. This privacy notice fulfils that requirement.

The right of access. All of the information we have about you can be accessed through request.

The right to rectification. Most of your data can be modified and corrected via our Customer Service calling 01793230550.

The right to erasure. In certain circumstances, you have the right to request that we delete personal data held on you. This does not apply if we have a legal reason for retaining it.

The right to restrict processing. In certain circumstances, you have the right to ask us to 'restrict processing of data'. This means we would need to secure your data but not otherwise use it. In practice this would involve suspending your account and therefore your access to our services.

The right to data portability. You have a right to obtain some of the personal data we hold on you in a 'structured machine-readable' format. This information is available on request through our Customer Services team on 01793230550.

The right to object. You have the right to opt-out of any marketing communications that we may wish to send you. You can change your marketing preferences at any time from your Control Panel, or by using the 'unsubscribe' link contained in our marketing emails.

Rights related to automated decision-making including profiling. Combined IT Solutions Ltd does not apply any automated decision-making or profiling to any of your personal data.

If you have any questions about how Combined IT Solutions Ltd uses your personal data that are not answered here, or if you want to exercise your rights regarding your personal data, please contact our Customer Services team on 01793230550.

You have the right to lodge a complaint with the Information Commissioner's Office. Further information, including contact details, is available at <https://ico.org.uk>

### Data Controller

The GDPR makes a distinction between organisations that process personal data for their own purposes, known as 'Data Controllers', and organisations that process personal data on behalf of other organisations, known as 'Data Processors'.

Combined IT Solutions Limited is a Data Controller, registered in England under registration no. 6802186 with a registration address of

1 Cricklade Court, Cricklade Street Old Town, Swindon, Wiltshire, SN1 3EY

### Cookie Notice

Like everyone else we use cookies to make our services work. Wikipedia describes cookies as

*"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. Cookies were designed to be a reliable mechanism for websites to remember information (such as items added in the shopping cart in an online store) or to record the user's browsing activity (including clicking particular buttons, logging in, or recording which pages were visited in the past). They can also be used to remember arbitrary pieces of information that the user previously entered into form fields such as names, addresses, passwords, and credit card numbers."*

### Changes To This Privacy Notice

We recognise that transparency is an ongoing commitment, so we will keep this privacy notice under regular review.

This privacy notice was last updated on 25<sup>th</sup> of May 2018.