

# Privacy Policy (Data Protection Policy)

This Privacy policy sets out how Medhurst Communications Ltd uses and protects any information that we collect about you to enable us to provide you with our services.

Medhurst are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified then you can be assured that it will only be used in accordance with this privacy statement. To support our commitment to data protection, we are compliant and certified to the ISO 27001:2022 Information Security Standard.

### What information we collect

We will only collect your information for the purposes of providing our services to you. We may collect the following information:

- Your name and occupation
- Your landline and mobile telephone number
- Your postal address
- Your E-mail address
- Other information relevant to customer offers and/or surveys
- We may collect bank details for DD collection and/or refund of monies owed to you.
- If you visit our premises our CCTV system may capture images of you.
- We do not collect information relating to children of the age of 13 or under.
- We may indirectly collect, within encrypted back-ups other information such as, but not limited to; photos, videos, special category data, personal telephone numbers, date of birth.

### How we use the information we collect

We require your information to facilitate, process and maintain the services we provide to you, to inform you of our entire range of services and to help understand your needs. We may use the information to:

- Contact you regarding the services we provide to you.
- Provide you with any relevant documentation needed for the services we provide to you, for example; quotations, contracts, invoices etc.
- Send advisory notices that maybe required for reasons such as service maintenance.
- Improve our services.
- Send promotional information about new services, products, events or other information which we think you may find interesting.
- Contact you from time to time for market research purposes.
- Customise the website according to your interests.
- Contact you by email, phone, fax or mail.



# Securing your personal information

We are committed to ensuring that your information is secure and have put in place suitable physical, electronic and organisational procedures to safeguard and secure the information we collect.

- Appropriate physical security is in place at all locations where information is held
- Electronic information is held securely on our servers, PC's and mobile devices and access is protected by complex passwords and/or biometric methods and Multi-Factor Authentication where available.
- Electronic information is backed-up daily both on-site and off-site with a minimum retention period of 30 days. All back-ups are securely encrypted and utilise immutability technology.
- Any paper/manual information is kept in secure record keeping systems

### Third Party Data Processors:

We may use certain third party data processors to collect, store and process personal information on our behalf. Please refer to their individual privacy policies below:

- Atlantic Data <u>Privacy\_Statement.pdf (disclosures.co.uk)</u>
- British Assessment Bureau
  <u>Privacy Policy | British Assessment Bureau (british-assessment.co.uk)</u>
- David Hall <u>Privacy-Policy.pdf (davidhall.org.uk)</u>
- Connectwise <u>Privacy Policy | How Your Protected (connectwise.com)</u>
- Microsoft Office 365 <u>https://privacy.microsoft.com/en-gb/privacystatement</u>
- Microsoft Azure <u>https://privacy.microsoft.com/en-gb/privacystatement</u>
- Microsoft VLSC <u>https://privacy.microsoft.com/en-gb/privacystatement</u>
- Webroot <u>https://www.webroot.com/gb/en/legal/privacy</u>
- Access Uk Ltd <u>https://www.theaccessgroup.com/privacy-and-legal/</u>
- Axis Fire and Security Services Ltd <a href="http://www.axissecurityltd.co.uk/sitemap/">http://www.axissecurityltd.co.uk/sitemap/</a>
- GreenCo <u>Privacy policy Green Co (green-co.uk)</u>
- CommsCare <u>http://www.comms-care.com/privacy</u>
- Giacom <u>Privacy and cookies policy Giacom</u>
- Drift IT Limited <u>http://clickdrift.com/privacy-notice/</u>
- HPE <u>https://www.hpe.com/uk/en/legal/privacy.html</u>
- HP <u>http://www8.hp.com/uk/en/privacy/privacy.html</u>
- Aruba <u>https://www.hpe.com/us/en/legal/privacy.html</u>
- TalkTalk <u>https://www.talktalk.co.uk/legal/privacy-policy/</u>
- Exclaimer <u>https://www.exclaimer.co.uk/company/privacy-policy</u>
- Moorepay <u>https://www.moorepay.co.uk/privacy-policy/</u>
- Trethowans Solicitors Privacy Policy | Trethowans Solicitors
- Towergate Insurance <u>Towergate Insurance (towergaterisksupport.co.uk)</u>
- Westcoast <u>Westcoast Privacy Policy</u>
- Sage <u>Privacy and Cookies | Sage UK</u>



# Sharing your personal information

- We may share your personal information with our professional advisors or insurers where reasonable and necessary for managing disputes and/or risks, gain professional advice, implementing or maintaining insurances where required
- Your personal information may be shared with certain suppliers where it is reasonable for them to need it for the provision and delivery of services or goods
- We may share your personal information with any organisation in our group of companies where reasonably necessary for the purposes set out in this policy
- We will share your personal information for compliance to regulatory or legal entities where required by UK law

# **Retaining your personal information**

- We will retain your personal information for as long as is reasonably necessary for the processing, delivery and legality of any services or products provided to you
- We may retain your personal information for extended time where such retention is needed for compliance to legal requirements or any disputes that may occur and be ongoing after a service has ended

# **Controlling your personal information**

You may choose to restrict the collection or use of your personal information in the following ways:

- If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to us or emailing us at optin@medhurst-it.com.
- We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.
- We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so.
- You may request details of the personal information which we hold about you or request removal of such data under EU GDPR. A small fee may be payable. If you would like a copy of the personal information held on you, please e-mail us at privacy@medhurst-it.com
- If you believe that any information we are holding on you is incorrect or incomplete, please write to us or email us as soon as possible at the referenced address. We will promptly correct any information found to be incorrect.
- Any data held on our back-up systems, including CCTV images, will not be removed manually on request. Data will cease to be held on the backups when the data deletion date exceeds the retention periods set for back-ups. All back-ups are encrypted for security.

The General Data Protection Regulation (GDPR) sets out your individual rights to your personal information, they are:

**Right to be informed** – You have the right to be informed about the collection and use of your personal data

**Right of Access** – You have the right to access your personal data and to be aware of and verify the lawfulness of our processing of it

**Right to Rectification** – You have the right to have inaccurate personal information rectified or completed if incomplete

**Right to Erasure** – Also known as 'your right to be forgotten', you can request personal information be erased. This right is not absolute and exclusions may apply for compliance or legal reasons



**Right to restrict processing** – You have the right to request restriction of the use of your personal information. For example, you contest the accuracy of personal information, processing is unlawful but you oppose erasure, we no longer need personal data for processing purposes for delivery of services but it is required for the establishment, exercise or defence of legal disputes or claims.

**Right to data portability** – You have the right to obtain and reuse your personal data. You have the right to receive your personal data in a structured, commonly used and machine readable format.

**Right to object** – You have the right to object to the processing of your data on grounds relating to your particular situation and processing is based on; legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling), direct marketing (including profiling) and processing for purposes of scientific/historical research and statistics. If you make such an objection we will stop processing your personal information unless we can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual, or the processing is for the establishment, exercise or defence of legal claims.

# **Our Website (Cookies)**

Our Website does not currently make use of cookies therefore we do not collect personal information about you from our Website.

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. A web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We may use traffic log cookies to identify which pages are being used. This would help us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We would only use this information for statistical analysis purposes and then the data would be removed from the system.

Overall, cookies would help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer systems or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

### Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

### **Changes to our Privacy Policy**

Medhurst may change this policy from time to time. Please check our website for the latest version. This policy is effective from 25<sup>th</sup> April 2023.



# How to contact us

Information Security Manager Medhurst Communications Ltd 17 Brunel Way Segensworth Fareham Hampshire PO15 5TX

e-mail: privacy@medhurst-it.com

#### **Data Protection Registration**

Medhurst Communications Ltd is registered with the Information Commissioners Office (ICO) Registration Reference: ZA327006