ProCompliance

TERMS AND POLICIES

Privacy Policy

How we collect information, the types of data we collect from you and from other sources, and the practices that keep it secure.

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Privacy Policy

Introduction

Here at ProCompliance we take our customers' privacy seriously. The protection and management of all personal information held on, and for, the client is stored and processed correctly and securely in line with the UK Data Protection Act 2018 and the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019.

1 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.

2 What is personal data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") 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 obtain and use is detailed in this privacy policy.

3 What are my rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- 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 the policy.
- The right to access the personal data we hold about you.
- 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 9 to find out more.
- 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 hold. Please contact us using the details in Part 9 to find out more.

- The right to restrict (i.e. prevent) the processing of your personal data.
- The right to object to us using your personal data for a particular purpose or purposes.
- The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- 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.
- 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 9.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

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. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in part 9.

4 The type of personal information we collect

When you use our platform, we collect and process the following information:

- Full name of administrator(s) and end users
- Email address of administrator(s) and end users
- Organisation information (e.g., Name, Address, Telephone number)

When we send marketing information to existing or potential clients (organisations to whom we licence the platform), we use email addresses that we may have received from reputable third parties or we may use email addresses provided by the client (or potential client) directly, for the purposes of marketing.

5 How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you (the client) for one of the following reasons:

- Allowing end user access to the services
- Clients reporting and roll out of the services

- To remind you to use the platform to complete compliance training you have registered for or to update you or communicate changes relating to the platform to you. This type of communication can be by email or through the platform (mobile app).
- We also market to data subjects and organisations who have consented to, or requested to, receive our marketing information. We use Brevo software (Brevo are appointed as our data processor) to manage our marketing activities.

We also receive third party personal contact information indirectly, from the following sources:

- Reputable data providers

We use the information that you have given us in order to provide access to end users, aid the administrator(s) in rolling out the services and also reporting on the results.

We use a number of third party providers to deliver our service, including storage providers (based in the United Kingdom) and third party IT developers providing IT services, who may have access to personal data on our live systems for the purpose of delivering their services only. Their access to our live systems and personal data is set out in detail in our (written) data processing agreement.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- Your consent, and;
- our legitimate interest in processing the personal data (and our assessment that our processing does not prejudice your rights and interests or privacy)

Where our processing relies on consent, you are able to remove your consent at any time. You can do this by contacting info@procompliance.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, telephone and/or post with information, news, and offers on our products and/or 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 Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We do not share your personal data with third parties for any marketing purposes unless we have your express opt-in consent in advance, and you will be able to opt-out at any time.

6 How we store your personal information

6.1 For service delivery

Your information is securely stored.

For the purpose of delivering our service, We keep all personal data for the length of time a customer remains in a legitimate business agreement with ProCompliance, plus an additional 13

months from the date an agreement ends. We will then dispose of your information by erasing all information from our records and databases.

We will only store your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfers of personal data to the EEA from the UK are permitted without additional safeguards.

We will not share any of your personal data with any third parties for any purposes, subject to the following exception(s).

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

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.

6.2 For service delivery

We buy business data. All business data, which may include data on an individual within the business, will only be acquired through reputable data providers. The data will be used for the purposes only of which the data has been acquired for. This may include, but is not limited to, email marketing and telemarketing services. Data acquired for this purpose will be stored in a reputable customer relationship management (CRM) system, of which will be audited by ProCompliance to ensure they adhere to the minimal standards as set out by the ICO for handling data. All data acquired will be purchased lawfully, and refreshed annually to ensure accuracy of data. Where data is no longer accurate, this data will be erased immediately.

7 Your data protection rights

Under data protection law, you have rights including:

- **Your right of access:** You have the right to ask us for copies of your personal information.
- **Your right to rectification:** You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure:** You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing:** You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing:** You have the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability:** You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at info@procompliance.co.uk if you wish to make a request.

8 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: Email address: info@procompliance.co.uk

9 How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at info@procompliance.co.uk.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Helpline number: 0303 123 1113
ICO website: https://www.ico.org.uk