



DATA PROTECTION AND CONFIDENTIALITY

WHO WE ARE

Computer Strategies are committed to protecting your personal data in line with the relevant legislation (Data Protection Law). The relevant legislation includes the General Data Protection Regulation (EU 2016/679) and the UK Data Protection Act 2018, as well as other potentially supporting legislation.

WHY THIS POLICY IS IMPORTANT

This policy is intended to provide information about how we will use (or process) personal data about individuals including our current, past and prospective customers, consultants, suppliers and other third parties as well as visitors to our website. It also covers the way in which Computer Strategies will handle personal data when it has access to the personal data in circumstances where a customer is the data controller and Computer Strategies the data processor for its customer. This will arise in respect of personal data processed pursuant to a service level agreement or other contract with our customer.

This information is provided in accordance with the rights of individuals under Data Protection Law to understand how their data is used.

This Privacy Notice applies alongside any other information Computer Strategies may provide about a particular use of personal data, for example when collecting data.

RESPONSIBILITY FOR DATA PROTECTION

Computer Strategies has appointed Dan Spencer to oversee its role as Data Protection Manager (DPM), who will deal with all requests and enquiries concerning Computer Strategies use of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law.

Dan Spencer may be contacted by:

- email: gdpr@computerstrategies.co.uk
- telephone: 01483238260
- post: 4 Saxton Parklands, Guildford, Surrey GU2 9JX

WHY COMPUTER STRATEGIES NEEDS TO USE PERSONAL DATA

In order to carry out its ordinary duties to clients, Computer Strategies may need to process a wide range of personal data about current, past and prospective staff and customers as part of its daily operation.

Computer Strategies will need to carry out some of this activity in order to fulfil legal rights, duties or obligations including those under a contract with its customers.

Other uses of personal data will be made in accordance with Computer Strategies legitimate interests, provided that these are not outweighed by the impact on individuals and provided it does not involve special categories of personal data.



Computer Strategies expects that the following uses may fall within the category of its legitimate interests:

- To provide IT managed services;
- Maintaining relationships with customers and the business community;
- For the purposes of management planning;
- For security purposes; and
- Where otherwise reasonably necessary for Computer Strategies purposes, including to obtain appropriate professional advice and insurance.

TYPES OF PERSONAL DATA OBTAINED BY COMPUTER STRATEGIES

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- bank details and other financial information;
- passwords;
- access to personal data held by customers whilst providing them with IT managed services.

HOW COMPUTER STRATEGIES COLLECTS DATA

Generally, Computer Strategies receives personal data from the individual directly in the ordinary course of interaction or communication (such as verbally, by email or by written documents).

However, in some cases personal data may be supplied by third parties (for example an employer, customer either directly or by giving Computer Strategies access to the IT systems, or other companies or authorities working with that individual).

DATA COLLECTED THROUGH THE COMPUTER STRATEGIES WEBSITE

Computer Strategies may collect the following information from visitors to its website: IP addresses and information about the location of the visitor the way that a visitor uses the website, including the pages viewed, dates, times and duration data to show where visitors navigated to or from our website and searches made on our website.

This data is used to enable Computer Strategies to:

- run the website ensuring that it works properly
- improve the information on the website
- maintain the websites security

Cookies are a piece of data which a website sends to a user's computer. It is stored on the user's computer and can be used to collect information on their site usage. Computer Strategies use cookies to identify how many users visit each page of its website so that it can improve the websites value to its visitors. Computer Strategies



does not use cookies in any way which would allow it to identify visitors to its website. If you want to block cookies then you can do so through your web browser or through other software but in doing so you may find that you will be unable to visit some or all of the Computer Strategies website.

WHO HAS ACCESS TO PERSONAL DATA AND WHO COMPUTER STRATEGIES SHARES IT WITH

Occasionally, Computer Strategies will need to share personal information with third parties, such as professional advisers (lawyers and accountants) or relevant authorities such as the police.

For the most part, personal data collected or accessed by Computer Strategies will remain within the company and will be processed by appropriate individuals only in accordance with access protocols (ie. on a need to know basis). Computer Strategies will where appropriate ensure that their personnel access or Process Personal Data only for the purpose of performing services to customers in accordance with instructions given by the customer to Computer Strategies from time to time.

In accordance with Data Protection Law, some of Computer Strategies processing activity is carried out on its behalf by third parties, such as cloud services and storage providers. This is always subject to undertakings from such third parties that personal data will be kept securely and only in accordance with Computer Strategies specific direction.

Computer Strategies shall not cause or allow Personal Data to be transferred and/or processed in a county or territory which is outside of the European Economic Area without prior written consent.

HOW LONG COMPUTER STRATEGIES KEEPS PERSONAL DATA

Computer Strategies will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason.

If you have any specific queries about how this policy is applied or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the DPM. However, please bear in mind that Computer Strategies may have lawful and necessary reasons to hold on to some data.

SECURITY

Computer Strategies has implemented and shall maintain appropriate technical and organisational security measures, processes and controls to safeguard all Personal Data processed by them against unauthorised and unlawful processing and accidental loss, disclosure or destruction.

IT MANAGED SERVICES

To enable Computer Strategies to provide IT managed services, customers will have to provide access to their IT systems with the result that Computer Strategies will have access to personal data held by the customer. In such circumstances, Computer Strategies will:

1. Ensure that any such data will only be processed by Computer Strategies staff on a need to know basis.



2. Ensure that the personal data remains within Computer Strategies but where Computer Strategies share the data with third parties such as cloud service and storage providers, it is done so on an undertaking from such third parties that personal data will be kept securely and only in accordance with Computer Strategies specific direction. If requested by a customer, Computer Strategies will supply to the customer evidence that the third party will comply with their obligations under the General Data Protection Regulations.
3. Not cause or allow the personal data to be transferred and/or processed in a country or territory outside of the European Economic Area without prior written consent from the customer.
4. Maintain suitable and adequate security in accordance with the provisions of this agreement.
5. Notify a customer of any data breach that takes place in accordance with the paragraph dealing with breach of notification below.

CONFIDENTIALITY

Computer Strategies acknowledges that in the provision of its IT managed services, it may have access to a customer's confidential information concerning their business affairs, customers, clients or suppliers.

Computer Strategies undertakes that it shall not at any time disclose to any person any confidential information belonging to the customer and shall ensure that its staff, officers, representatives or advisers to whom it discloses a customer's confidential information complies with this clause.

Computer Strategies may however disclose confidential information to the extent that such confidential information is required to be disclosed by law, by any government or other regulatory authority or by a Court or other authority of competent jurisdiction provided that, to the extent it is legally permitted to do so, it gives the customer as much notice of such disclosure as possible.

BREACH NOTIFICATION

Computer Strategies shall notify a customer when it becomes aware of or suspects that a data breach has taken place. Such notification will be made within 24 hours of Computer Strategies becoming aware of the breach save where the breach comes to the attention of Computer Strategies during a weekend or bank holiday when the notification will be made to the customer by 10am or the next business day. The notification will include a description of the data breach, the date and time of the breach, the type of data affected by the breach, an explanation of how the breach occurred, the number of data subjects concerned and details of how and when Computer Strategies first becomes aware of the breach. In circumstances where there has been a breach Computer Strategies will provide all reasonable advice and assistance to the customer involved in a timely manner.

YOUR RIGHTS

Individuals have various rights under Data Protection Law to access and understand personal data about them held by Computer Strategies and in some cases ask for it to be erased or amended or for Computer Strategies to stop processing it, but subject to certain exemptions and limitations.



Any individual wishing to access or amend their personal data or wishing it to be transferred to another person or organisation, should put their request in writing to the DPM.

Computer Strategies will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within the statutory time-limits, which is one month in the case of requests for access to information. Computer Strategies will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, Computer Strategies may ask you to reconsider or charge a proportionate fee, but only where Data Protection Law allows it. Computer Strategies shall also provide its customers with such assistance as the customer reasonably requests in order to comply with its obligations and to fulfil a data subject's rights.

You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal professional privilege.

CONSENT

Where Computer Strategies is relying on consent as a means to process personal data, any person may withdraw this consent at any time. Please be aware however that Computer Strategies may have another lawful reason to process the personal data in question even without your consent. That reason will usually have been asserted under this Data Protection and Confidentiality provision or may otherwise exist under some form of contract or agreement with the individual (for example: an employment contract).

DATA ACCURACY AND SECURITY

Computer Strategies will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify the DPM of any changes to information held about them.

An individual has the right to request that any inaccurate or out-of-date information about them is erased or corrected (subject to certain exemptions and limitations under Act): please see above.

Computer Strategies will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to company systems. All staff will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

QUERIES AND COMPLAINTS

Any comments or queries on this policy should be directed to the DPM.

If an individual believes that Computer Strategies has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should notify the DPM. An individual can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps



are taken to resolve the matter with Computer Strategies as the Data Controller or Processor before involving the regulator.