



SURESERVE GROUP PLC

PRIVACY POLICY

Privacy Policy



Sureserve Group plc ("Sureserve") respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you become a customer, visit our website or each time you contact us. This policy will also tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below.

1. Important information and who we are
2. The data we collect about you
3. How is your personal data collected?
4. How we use your personal data
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1. Important information and who we are

Purpose of this privacy notice

This privacy notice explains how Sureserve collects and processes your personal data through your contact with us, including your use of this website and any data you may provide through this website, for example when you sign up to our news announcements or fill out a contact form.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

Sureserve is the controller and responsible for your personal data (collectively referred to as Sureserve, the "Company", "we", "us" or "our" in this privacy notice). Sureserve is registered as a data controller with the Information Commissioner's Office (ICO), the UK's independent supervisory authority for data protection issues. Our ICO registration number is ZA150588.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

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Contact details

Further information on our data protection policies and procedures can be obtained from

Sureserve Group plc
Unit 1, Yardley Business Park
Luckyn Lane
BASILDON
Essex
SS14 3BZ

Email: DataProtection@sureservegroup.co.uk

Should you be unhappy with the way in which Sureserve manages your data, you have the right to make a complaint at any time to the Information Commissioner's Office at www.ico.org.uk. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

2. The data we collect about you

Sureserve will only collect the personal information we need from you and about you. This information will vary depending on the services we provide or offer to you and on any contractual relationship between you and Sureserve.

We may process different kinds of personal data about you, which are set as follows:

Personal data – This is any information that can be used to identify you, for example your name, address, date of birth, National Insurance number, email and/or postal address. We may also collect technical data such as your internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

Special category of personal data – this is sensitive personal information, such as your racial or ethnic origin, health information. Sureserve will, however, only collect your sensitive personal information should there be a clear and lawful need for us to do so, such as to assess which services may be relevant to you, to offer appropriate support or for diversity and equal opportunities monitoring.

Criminal record data – Sureserve will collect and use information about any criminal convictions for the purposes of recruitment. This is to prevent fraud, protect information and equipment and to protect the health and safety of our employees and customers.

3. How is your personal data collected?

We use different methods to collect data from and about you, including through:

Direct interactions. You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services;
- apply to work for us;
- create an account on our website;

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- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.

Automated technologies or interactions. As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details.

Third parties or publicly available sources. We may obtain information from other individuals or organisations if you have given permission for them to share it with us. This might include central government, local authorities, landlords, health professionals or other organisations on whose behalf Sureserve may deliver a service to you.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email.

You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we use your personal data

A description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so, are set out below. We have also identified what our legitimate interests are where appropriate.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason. This other reason must be compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

Examples of specific purposes for collecting your data include:

- 1. To register you as a new customer**
- 2. To process and deliver your order**
- 3. To manage our relationship with you**
- 4. To manage an application to work for Sureserve Group**
- 5. To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you**
- 6. To provide regulatory news via an automated email alert service**
- 7. Marketing**

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Please contact us if you need details about the specific legal ground we are relying on to process your personal data.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Sharing your personal data

We may have to share your personal data with third parties for the purposes set out in section 4 above. These include:

- **Other companies in the Sureserve Group** acting as joint controllers and/or processors and who are based in the UK and/or other countries and provide IT and/or system administration services.
- **Professional advisers** acting as processors and/or joint controllers including lawyers, bankers, auditors and insurers based the UK and/or other countries who provide consultancy, banking, legal, insurance and accounting services.
- **HM Revenue & Customs, regulators and other authorities** acting as processors based in the United Kingdom who require reporting of processing activities in certain circumstances.
- **Marketing services providers** acting as processors including mailing and survey companies operating in the EEA who provide distribution, reporting and analysis of emails and surveys.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Sureserve will never:

- **sell or rent your data to third parties**
- **sell or rent your data for marketing purposes**

6. International transfers

Sureserve is a UK-based company and we do not transfer your personal data outside the European Economic Area (**EEA**).

Should a lawful need arise to transfer personal data outside the EEA:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us if you would like further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. Data security

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We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us. In some circumstances you can ask us to delete your data: see the right to erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

The Data Protection Act 2018 provides individuals with a number of rights concerning their personal data:

The right to be informed

You have the right to be informed about how Sureserve collects and uses your personal information. This privacy policy forms part of this right and concise and clear privacy notices will also accompany any requests for information that be made to you by us.

The right of access

You have the right to ask to see the personal data we hold about you and ordinarily the right to have us provide you with a copy of this data. A request to see this information is known as a 'subject access request' ("SAR").

SARs need to be made in writing or by email to the Data Protection Officer using the contact details above. Before processing we will seek proof of your identity, or your consent should you use the services of a third party to request your information. If you require specific information, it is helpful if this is clear in your request, for example, information from a particular time period or about a specific correspondence.

Sureserve will provide the first copy of this information free of charge, but additional copies may be subject to a reasonable fee. This does not mean that we will charge for all subsequent subject access requests.

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We will aim to provide you with the information you have asked for within one calendar month. The data provided to you will be a copy of the personal information we hold that relates to you.

The right to rectification

You can ask us to correct your personal data if it is inaccurate or incomplete. You can also help us keep our records accurate by informing us of any changes to your details.

The right to erasure

In some circumstances, you have the right to the erasure of your personal data. This may include, for example:

- If the personal data is no longer necessary for the purposes for which it was collected or processed;
- If you withdraw your consent to consent-based processing;
- The processing is for direct marketing purposes;
- If you have successfully exercised your right to object to processing (see below);
- If we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.

We may not always be able to comply with your request of erasure for specific legal reasons but we will notify you of any reason, if applicable, at the time of your request.

The right to object

You have an absolute right to object to our processing of your personal data for marketing purposes.

You can also object where we are relying on one of the following lawful bases:

- 'public task' (for the performance of a task carried out in the public interest);
- 'public task' (for the exercise of official authority vested in you); or
- legitimate interests.

Any objection must give specific reasons why you are objecting to the processing of your data and these should be based upon your particular situation.

In these circumstances this is not an absolute right, and Sureserve may continue processing if:

- we 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.

The right to restrict processing

In some circumstances, you may ask us to suspend the processing of your personal data. This includes:

- if you want us to establish the data's accuracy;
- where our use of the data is unlawful but you do not want us to erase it;
- where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

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Where processing has been restricted on this basis, we may continue to store your data but observe the restrictions on processing unless

- you provide your consent for us to do so;
- it is for the establishment, exercise or defence of legal claims;
- it is for the protection of the rights of another person; or
- it is for reasons of important public interest.

The right to data portability

Where you request, we will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.

This right only applies to information that you provided to Sureserve as a data controller.

Rights in relation to automated decision making and profiling

You have the right to challenge the validity of any decisions made through automated decision making (decisions made without any human input). You may also ask us not to process your information in this way.

Sureserve does not currently undertake any automated decision making or profiling.

If you wish to exercise any of the rights set out above, please contact us.