DATA PRIVACY POLICY FOR CLIENTS AND SUPPLIERS

Introduction

PJF COMPUTER SOLUTIONS Ltd are committed to protecting and respecting our customers privacy, to this end we adhere to and comply with all policy documents and statements listed below and, on our website, [www.pjfcomputersolutions.co.uk\securitypolicy]. All procedures and regulations are intended for our customers only and do not apply to non-customers.

This policy (together with our other policies and statements relating to data security found on our website [www.pjfcomputersolutions.co.uk\securitypolicy]) sets out the basis on which any personal data we collect, or that is provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

PJF Computer Solutions is the data controller. This means we decide how personal data is processed and for what purposes. Our contact details are: (028) 9262 2877. For all data matters contact Peter Fraser on (028) 9262 2877.

3. The purpose(s) of processing your personal data

We use personal data for the following purposes:

Supplying I.T Support Services, including remote support and storage of usernames, passwords and account details for User security, local computers, local networks and cloud storage facilities.

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

Personal data, usernames, passwords, Online and cloud details, contact details, addresses, email addresses and passwords, IP addressing, and any other data required to supply our services.

We have obtained personal data from setting up accounts and services on our customers behalf, and from customers directly.

5. What is our legal basis for processing your personal data?

a) Personal data (article 6 of GDPR)

Our lawful basis for processing your general personal data:

☐ Consent of the data subject;	GDPR CONSENT FORM
☐ Processing necessary for the performance of an agreement with the data subject	GDPR CONSENT FORM
☐ Processing necessary for compliance with a legal obligation	
☐ Processing necessary to protect the vital interests of a data subject or another person	
☐ Processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	
☐ Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject	

6. Sharing your personal data

Personal data will be treated as strictly confidential and will NOT be shared with anybody but the customer or their legal representatives as laid down by law.

7. How long do we keep your personal data?

We will only retain 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. We keep personal data for as long as necessary to supply our services to the customer. If our services are no longer required, or if instructed by the customer, all data will be deleted within 5 working days.

8. Providing us with your personal data

Customers are under no statutory or contractual requirements or obligation to provide us with personal data, but failure to do so will mean the services and support we supply will be restricted.

9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to request that we provide you with your personal data and where possible, to transmit
 that data directly to another data controller, (known as the right to data portability), (where
 applicable i.e. where the processing is based on consent or is necessary for the performance of a
 contract or agreement with the data subject and where the data controller processes the data by
 automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

10. Transfer of Data Abroad

Data will only be processed outside of the EEA in connection with supplying our services to individual customers and only by agencies who comply with GDPR levels of security.

11. Automated Decision Making

WE DO NOT USE ANY FORM OF AUTOMATED DECISION MAKING IN OUR BUSINESS.

12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

13. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

14. Telephone call recording

All incoming and outgoing telephone calls are recorded for the purpose of avoiding confusion when receiving instructions from our customers and are not used for any other purpose. Calls are stored on our Online Exchange server and automatically deleted after one month.

15. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our Data Protection Officer on (028)9262 2877

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the <u>Information Commissioners Office</u> on 03031231113 or via email https://ico.org.uk/global/contact-us/email/ or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.