

# Privacy Statement – Customers/Prospective Customers V1.1 May 2018

# **Background and scope**

This privacy statement applies to personal information collected and used by SARD JV Ltd in relation to the provision of our products and services. This statement describes how and why we collect and use personal data and provides information about individuals' rights. This statement should be used in conjunction with any contract/SLA agreements and data processing agreements undertaken between SARD JV Ltd and contracted customers. In the event of a discrepancy, agreed contract documents will take precedence.

Personal data is any information relating to an identified or identifiable living person. It is our policy to be transparent about how and why we collect and process personal data.

#### About us

Our head office is SARD JV Ltd, Suite 2D, Foresters Hall, 25-27 Westow Street, London SE19 3RY. We are the data controller of your personal data and provider of your product or services. If you have any questions about this notice, or if you wish to exercise your rights therein, please contact us on <a href="mailto:info@sardjv.co.uk">info@sardjv.co.uk</a>, 0208 771 4153 or at the address given above.

#### What information do we hold?

Personal information that we hold and process in relation to our products and services includes:

- Personal and contact details, such as title, full name, address, contact details, job title, telephone number (work only unless home details are provided)
- Company information, including company name, contact details and address, number of employees, companies house number.
- Suppliers and budget, and personnel responsible for buying software systems
- Records of your contact with us such as via the phone and/or email
- Products and services you hold with us, as well as have been interested in
- Analytics regarding visits to our website this is limited to browser type and other non-identifiable information and is purely for use in optimising your experience.
- Newsletter preferences and mailing list analytics eg newsletter opens and click through percentages.

#### Where do we get your data from?

We may collect personal information from the following general sources:

- From you directly through calls, emails or newsletter sign up forms (these last are managed by Mailchimp)
- Support requests either by Live Chat Support or support tickets
- In person at trade shows, events or user group meetings
- Publicly available procurement details on eg NHS Trust websites or other published lists.

## How we use your personal information

The information we hold will be used for the following principle purposes

- We may use your details to communicate with you by email, post or over the phone
- To provide support and management of all aspects of the product or service you have with us
- To identify relevant interested parties for our services
- To maintain your customer records, manage finances and recover payments
- To provide information about updates and issues with our services
- To keep records of your communications with us in order to ensure a high level of support and continuity
- · Direct marketing only when opted-in ie through MailChimp newsletter sign up
- To help us develop new products and services and help us improve current products and services
- Comply with legal and regulatory obligations, requirements and guidance

## What are our grounds for holding this personal information?

We may hold your data for the following legal bases, one or more of these will always be applicable:

- It is needed to provide you with contracted products or services
- It is in our legitimate interests to do so
- It is to comply with legal obligations
- You have given us your explicit consent

#### When do we share your personal information?

We will only ever share your information with third party processors in order to facilitate the purposes listed above. These third parties may include:

- Server and back-up hosting providers
- Support software providers (eg Snapengage and Uservoice who provide our Live Chat and Support functions)
- Document storage providers
- CRM management software
- Financial accounting services
- Email providers
- Legal or regulatory bodies

We will always ensure that all third party suppliers and processors are subject to GDPR compliant Data Processing Agreements.

We will not share your information outside the EU unless specific safeguards are in place, for example by using approved contractual agreements and/or the destination is included in the GDPR list of countries meeting the adequacy criteria. Please note that our main system

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servers for the SARD and Foundry software are based in the EU and user data is not transferred outside this region (as bound by our Data Processor Agreement)

We will never sell your data to any third party or use automated decision making systems in relation to your personal data.

## How and when can you withdraw your consent?

If we are relying on your consent to process or hold personal data, you can withdraw this at any time by contacting us on the details above.

# What should you do if your information changes?

You can contact us at any time to update the details we hold

## For how long do we retain your personal information?

Unless otherwise discussed, we will hold your personal information:

- For as long as we have reasonable business needs such as managing our contract with you and our operations.
- For retention periods in line with legal and regulatory requirements or guidance.

# What are your personal rights and how do you contact us?

If at any point you believe the personal information we hold on you is incorrect, you want us to correct or delete that information, or you no longer want us to hold that information or contact you, you can exercise your rights under the current Data Protection laws. These rights include:

- Right of access
- Right to rectification
- Right to erasure
- Right to restriction of processing
- Right to data portability
- Right to object

For any enquiries regarding exercising these rights please contact us at <a href="mailto:info@sardjv.co.uk">info@sardjv.co.uk</a> or 0208 771 4153.

For more information about your personal data rights please visit the Information Commissioner Office website at: <a href="https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr">https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr</a>