

Customer Data Privacy Policy

1 Introduction

- 1.1.1 We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.
- 1.1.2 We collect, use and are responsible for certain personal information about you. When we do so we are subject to the UK General Data Protection Regulation, which applies across the United Kingdom and we are responsible as 'controller' of that personal information for the purposes of those laws.

2. Key terms

We, us, our	Novocomms Ltd
Our data protection officer	Chief Executive Officer
Personal information	Any information relating to an identified or identifiable individual
Special category personal information	Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data Data concerning health, sex life or sexual orientation

3. Personal information we collect about you

- 3.1 We may collect and use the following personal information about you:
- 3.1.2 your name and contact information, including email address and telephone number and company details
- 3.1.3 Information to enable us to check and verify your identity, e.g., your date of birth
- 3.1.4 your gender information, if you choose to give this to us
- 3.1.5 location data, if you choose to give this to us
- 3.1.6 your billing information, transaction and payment card information
- 3.1.7 your personal or professional interests
- 3.1.8 your professional online presence, e.g., LinkedIn profile
- 3.1.9 your contact history, purchase history and saved items
- 3.1.10 information from accounts you link to us, e.g., Facebook
- 3.1.11 information to enable us to undertake credit or other financial checks on you
- 3.1.12 Information about how you use our website, IT, communication and other systems
- 3.1.13 your responses to surveys, competitions and promotions

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This personal information is required to provide products and services to you. If you do not provide personal information we ask for, it may delay or prevent us from providing products or services to you.

4. How your personal information is collected

- 4.1 We collect most of this personal information directly from you—in person, by telephone, text or email or via our website and social media. We may also collect information:
 - 4.1.2 from publicly accessible sources, e.g., Companies House or HM Land Registry;
 - 4.1.3 directly from a third party, e.g.:
 - 4.1.4 sanctions screening providers;
 - 4.1.5 credit reference agencies;
 - 4.1.6 customer due diligence providers;
 - 4.1.7 from a third party with your consent
 - 4.1.8 from cookies on our website—for more information on our use of cookies, please see our cookies policy
 - 4.1.9 via our IT systems, e.g.:
 - 4.1.10 door entry systems and reception logs;
 - 4.1.11 automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems;

5. How and why, we use your personal information

- 5.1 Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.:
- 5.1.2 to comply with our legal and regulatory obligations;
- 5.1.3 for the performance of our contract with you or to take steps at your request before entering into a contract;
- 5.1.4 for our legitimate interests or those of a third party; or
- 5.1.5 where you have given consent.
- 5.2 A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.
- 5.3 The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use your personal information for	Our reasons
To provide products or services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or your	For our legitimate interests or those of a third

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What we use your personal information for	Our reasons
company	party, i.e., to minimise fraud that could be damaging for us and for you
<p>Conducting checks to identify our customers and verify their identity</p> <p>Screening for financial and other sanctions or embargoes</p> <p>Other processing necessary to comply with professional, le.g.al and regulatory obligations that apply to our business, e.g., under health and safety regulation or rules issued by our professional regulator</p>	To comply with our le.g.al and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our le.g.al and regulatory obligations
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures, so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	<p>For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information</p> <p>To comply with our legal and regulatory obligations</p>
Statistical analysis to help us manage our business, e.g., in relation to our financial performance, customer base, product range or other efficiency measures	For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service for you at the best price
Preventing unauthorised access and modifications to systems	<p>For our legitimate interests or those of a third party, i.e., to prevent and detect criminal activity that could be damaging for us and for you</p> <p>To comply with our le.g.al and regulatory obligations</p>
Updating and enhancing customer records	<p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>To comply with our le.g.al and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g., making sure that we can keep in touch with our customers about existing orders and new</p>

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What we use your personal information for	Our reasons
	products
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g., to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Marketing our services and those of selected third parties to: —existing and former customers; —third parties who have previously expressed an interest in our services; —third parties with whom we have had no previous dealings.	For our legitimate interests or those of a third party, i.e., to promote our business to existing and former customers
External audits and quality checks, e.g., Investors in People accreditation and the audit of our accounts	For our legitimate interests or those of a third party, i.e., to maintain our accreditations so we can demonstrate we operate at the highest standards To comply with our legal and regulatory obligations

5.4 The above table does not apply to special category personal information, which we will only process with your explicit consent.

6. Promotional communications

6.1 We may use your personal information to send you updates (by email, text message, telephone or post) about our products or services, including exclusive offers, promotions or new products and services.

6.2 We have a legitimate interest in processing your personal information for promotional purposes (see above '**How and why we use your personal information**'). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

6.3 We will always treat your personal information with the utmost respect and never sell or share it with other companies.

6.4 You have the right to opt out of receiving promotional communications at any time by:

6.4.1 contacting us at email:

6.4.2 using the 'unsubscribe' link in emails or 'STOP' number in texts

6.4.3 updating your marketing preferences on our record

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6.5 We may ask you to confirm or update your marketing preferences if you instruct us to provide further products or services in the future, or if there are changes in the law, regulation, or the structure of our business.

7. Who we share your personal information with

7.1 We routinely share personal information with:

- 7.1.1 third parties we use to help deliver our products or services to you, e.g., payment service providers, warehouses and delivery companies;
- 7.1.2 other third parties we use to help us run our business, e.g., marketing agencies or website hosts, IT company, company's accountant
- 7.1.3 third parties approved by you, e.g., social media sites you choose to link your account to or third-party payment providers;
- 7.1.4 our insurers and brokers;
- 7.1.5 our banks;
- 7.1.6 our solicitors.

7.2 We only allow our service providers to handle your personal information if we are satisfied, they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors, e.g., in relation to our company or Investors in People accreditation and the audit of our accounts.

7.3 We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

7.4 We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

8. Where your personal information is held

8.1 Information may be held at our offices, third party agencies, service providers, representatives and agents as described above (see above: **'Who we share your personal information with'**).

8.2 Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information when this occurs, see below: **'Transferring your personal information out of the EEA'**.

9. How long your personal information will be kept

9.1 We will keep your personal information while you have an account with us or we are providing products or services to you. Thereafter, we will keep your personal information for as long as is necessary:

- 9.1.2 to respond to any questions, complaints or claims made by you or on your behalf;
- 9.1.3 to show that we treated you fairly;
- 9.1.4 to keep records required by law.

9.2 We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information.

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9.3 When it is no longer necessary to retain your personal information, we will delete or anonymise it.

10. Transferring your personal information outside the UK

10.1 We will not share your personal information outside the UK.

10.2 If you would like further information, please contact us or our Data Protection Officer (see 'How to contact us' below).

11. Your rights

11.1 You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal information—in certain circumstances, e.g., if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal information being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

10.2 For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

10.3 If you would like to exercise any of those rights, please:

10.3.1 complete a data subject request form—available from CEO or HR manager

10.3.2 email, call or write to our Data Protection Officer—see below: '**How to contact us**'; and

10.3.3 let us have enough information to identify you [*your full name, address and customer or matter reference number*];

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10.3.4 let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and

10.3.5 let us know what right you want to exercise and the information to which your request relates.

11. Keeping your personal information secure

11.1 We have appropriate security measures to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We continually test our systems and are ISO 27001 certified, which means we follow top industry standards for information security.

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

11.3 If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

12. How to complain

12.1 If you have any concerns about our use of your personal information, you can make a complaint to us via email: sampson.hu@novocomms.com.

12.2 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>

13. Changes to this privacy policy

13.1 This privacy notice was published on 30 May 2022.

13.2 We may change this privacy notice from time to time—when we do, we will inform you via email.

14. How to contact us

14.1 Please contact our Data Protection Officer by post, email or telephone if you have any questions about this privacy policy or the information, we hold about you.

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14.2 Our contact details are shown below:

Our contact details
Novocomms Ltd
Email: info@novocomms.com
Tel: 01213929388

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