**INTRODUCTION**

Welcome to the ProcessUsTech’s Privacy Policy.

ProcessUsTech respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy 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**

**PURPOSE OF THIS PRIVACY POLICY**

This privacy policy aims to give you information on how ProcessUsTech collects and processes your personal data through your use of this website, including any data you may provide through this website.

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 policy together with any other privacy policy or fair processing policy 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 policy supplements other notices and privacy policies and is not intended to override them.

**CONTROLLER**

ProcessUsTech Ltd is the controller and responsible for your personal data (collectively referred to as ”ProcessUsTech”, “we”, “us” or “our” in this privacy policy).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise, please contact the DPO using the details set out below.

**CONTACT DETAILS**

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([*www.ico.org.uk*](http://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.

**CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES**

We keep our privacy policy under regular review. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

**THIRD-PARTY LINKS**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

**2.**  **THE DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

1. **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
2. **Contact Data** includes billing address, delivery address, email address and telephone numbers.
3. **Financial Data** includes bank account and payment card details.
4. **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
5. **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

**IF YOU FAIL TO PROVIDE PERSONAL DATA**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

**3.**  **HOW IS YOUR PERSONAL DATA COLLECTED?**

This includes personal data you provide when you:

1. apply for our products or services;
2. create an account on our website;
3. subscribe to our service or publications;
4. request marketing to be sent to you;
5. enter a competition, promotion or survey; or
6. give us feedback or contact us.
7. **Automated technologies or interactions.** As you interact with our website, we will 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. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
8. **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:

    Technical Data from the following parties:

**(a)**  analytics providers such as Google based outside the EU;

**(b)**  advertising networks; and

**(c)**  search information providers.

1. Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
2. Identity and Contact Data from data brokers or aggregators.
3. Identity and Contact Data from publicly available sources.

**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:

1. Where we need to perform the contract we are about to enter into or have entered into with you.
2. 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.
3. Where we need to comply with a legal obligation.

If you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

|  |  |  |
| --- | --- | --- |
| **Purpose/Activity** | **Type of data** | **Lawful basis for processing including basis of legitimate interest** |
| To register you as a new customer | (a) Identity(b) Contact | Performance of a contract with you |
| To process and deliver your order including:(a) Manage payments, fees and charges(b) Collect and recover money owed to us | (a) Identity(b) Contact(c) Financial(d) Transaction(e) Marketing and Communications | (a) Performance of a contract with you(b) Necessary for our legitimate interests (to recover debts due to us) |
| To manage our relationship with you which will include:(a) Notifying you about changes to our terms or privacy policy(b) Asking you to leave a review or take a survey | (a) Identity(b) Contact(c) Profile(d) Marketing and Communications | (a) Performance of a contract with you(b) Necessary to comply with a legal obligation(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services) |
| To enable you to partake in a prize draw, competition or complete a survey | (a) Identity(b) Contact(c) Profile(d) Usage(e) Marketing and Communications | (a) Performance of a contract with you(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business) |
| To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | (a) Identity(b) Contact(c) Technical | (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)(b) Necessary to comply with a legal obligation |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you | (a) Identity(b) Contact(c) Profile(d) Usage(e) Marketing and Communications(f) Technical | Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) |
| To use data analytics to improve our website, products/services, marketing, customer relationships and experiences | (a) Technical(b) Usage | Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) |
| To make suggestions and recommendations to you about goods or services that may be of interest to you | (a) Identity(b) Contact(c) Technical(d) Usage(e) Profile(f) Marketing and Communications | Necessary for our legitimate interests (to develop our products/services and grow our business) |

**MARKETING**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

**PROMOTIONAL OFFERS FROM US**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased [goods or services] from us and you have not opted out of receiving that marketing.

**THIRD-PARTY MARKETING**

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

**OPTING OUT**

You can ask us or third parties to stop sending you marketing by by following the opt-out links on any marketing message sent to you.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

**COOKIES**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

**CHANGE OF PURPOSE**

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 and that reason is 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.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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.**  **DISCLOSURES OF YOUR PERSONAL DATA**

We may share your personal data with the parties set out below for the purposes set out in the table above.

1. Internal Third Parties.
2. External Third Parties.
3. Specific third parties.
4. Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

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.

**6.**  **INTERNATIONAL TRANSFERS**

We share your personal data within the ProcessUsTech Group. This will involve transferring your data outside the European Economic Area (**EEA**).

We ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data. These rules are called “binding corporate rules”:

1. 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.
2. Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
3. Where we use providers based in the US, we may transfer data to them if they are part of the PrivacyShield which requires them to provide similar protection to personal data shared between Europe and the US.
4. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

**7.**  **DATA SECURITY**

**HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances we will 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.