

GDPR Policy Statement

Primary ICT Support Ltd ("Primary ICT") are committed to protecting and respecting the privacy of our customers. To ensure that our customers feel confident about our use of their Personal Information when dealing with Blue Logic we have prepared this this Privacy Policy which sets out how 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.

The Purpose of this Policy

This policy sets out the basis on which any Personal Information we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our practices regarding your Personal Information and how we will treat it.

Key terms

It would be helpful to start by explaining some key terms used in this policy:

| | |
|---------------------------------------|--|
| We, us, our | Primary ICT Support LTD |
| Our data protection officer | James Watson support@primaryictsupport.co.uk |
| 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 |

Background to this Policy

Primary ICT have reviewed all of the data that we hold on the following basis:

What data we are storing;

Why we store that data;

Where that data is stored;

Who has access to that data; and
When that data is used.

The data that we store is broadly split into the following categories:

Customer Data;

Supplier/vendor data;

Business Contacts Data; and

Prospects Data

The data we store will continue to be reviewed regularly to ensure we remain compliant with the General Data Protection Regulation ("GDPR").

Changes to this Policy

We keep our Privacy Policy under regular review. Any changes we make to our Privacy policy in the future will be posted on our [website](#). This policy was last updated on 21 May 2018.

Personal Information we collect about you

We may collect and use the following Personal Information about you:

Your name and business contact information, including email address and telephone number and company details

Your company's billing information

Your personal or professional interests

Your professional online presence, e.g. LinkedIn profile

Your business contact history, business purchase history and saved items

Information to enable us to undertake business credit or other financial checks on you

Information about how you use our website, IT, communication and other systems

Your responses to surveys, competitions and promotions

This Personal Information is required to provide information technology goods and services to you. If you do not provide Personal Information we ask for, it may delay or prevent us from providing these to you.

How your Personal Information is collected

We collect most of this Personal Information directly from you—in person, by telephone, text or email and/or via our website. However, we may also collect information:

from publicly accessible sources, e.g. Companies House, websites, LinkedIn

directly from a third party, e.g.: sanctioned screening providers;

- credit reference agencies;

from a third party with your consent (where required), e.g. your bank or building society

from cookies on our website—for more information on our use of cookies, please see our [website policy](#)

via our IT systems, e.g.: door entry systems and reception logs;

- 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

How and why we use your Personal Information

Under data protection law, we can only use your Personal Information if we have a proper reason for doing so, e.g.:

to comply with our legal and regulatory obligations;

for the performance of our contract with you or to take steps at your request before entering into a contract;

for our legitimate interests or those of a third party; or

where you have given consent.

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.

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 AND/OR services to you | For the performance of our contract with you or to take steps at your request before entering into a contract |

| | |
|--|---|
| <p>Conducting checks to identify our customers and verify their identity</p> <p>Screening for financial and other sanctions or embargoes</p> | <p>To comply with our legal and regulatory obligations</p> |
| <p>Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies</p> | <p>To comply with our legal and regulatory obligations</p> |
| <p>Operational reasons, such as improving efficiency, training and quality control</p> | <p>For our legitimate interests i.e. to be as efficient as we can so we can deliver the best service for you</p> |
| <p>Ensuring the confidentiality of commercially sensitive information</p> | <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> |
| <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</p> | <p>For our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service for you</p> |
| <p>Preventing unauthorised access and modifications to systems</p> | <p>For our legitimate interests, i.e. to prevent and detect criminal activity that could be damaging for us and for you</p> <p>To comply with our legal and regulatory obligations</p> |
| <p>Updating and enhancing customer records</p> | <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 legal and regulatory obligations</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 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 |
| Credit reference checks via external credit reference agencies | For our legitimate interests, i.e. to ensure our customers are likely to be able to pay for our products and services |
| External audits and quality checks, e.g. for the audit of our accounts | For our legitimate, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards To comply with our legal and regulatory obligations |

Promotional communications

We may use your Personal Information to send you updates (by email, telephone or post) about our information technology goods or services, including exclusive offers, promotions, events or new offerings.

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.

We will always treat your Personal Information with the utmost respect and never sell OR share it with other organisations for marketing purposes.

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

Who we share your Personal Information with

We routinely share Personal Information with:

third parties we use to help deliver our products AND/OR services to you, e.g. warehouses and delivery companies;

other third parties we use to help us run our business, e.g. marketing agencies or website hosts;

third parties approved by you, e.g. social media sites you choose to link your account to or third party payment providers;

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 the audit of our accounts.

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

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.

We will not share your Personal Information with any other third party.

The data we store

| Data Categories | Data Types | Lawful basis for processing | How Long do we store the data |
|-------------------------|---|---|---|
| Customer data | Business Contact Names Business postal addresses Business email addresses Business Telephone and Mobile numbers IT System Configuration Business bank account details | Performance of a contract. Necessary for our legitimate interests. To provide a good service | Contact information for the period of the contract term plus a further 3years. IT system information for the period of the contract term plus a further 6months to permit contract transfer. |
| Supplier data | Business Contact Names Business postal addresses Business email addresses Business Telephone and Mobile numbers Business bank accounts details | Performance of a contract. Necessary for our legitimate interests. | Indefinitely unless asked to be removed |
| Prospect data | Business Contact Names Business postal addresses Business email addresses Business Telephone and Mobile numbers | Necessary for our legitimate interests (to grow our business) | Indefinitely unless asked to be removed |
| Business Contact | Business Contact Names Business postal addresses | Performance of a contract. | Indefinitely unless asked to be removed |

| | | | |
|-------------------------|--|---|---|
| | Business email addresses Business Telephone and Mobile numbers | Necessary for our legitimate interests. | |
| Recruitment Data | CVs (including name, home address, telephone number, Personal email addresses, previous employment history) Business references, Certifications, Right to work data | Necessary for our legitimate interests. | For as long as is necessary to fulfil the purposes for which it was collected and processed |

How long we store your information for

We keep your information only for as long as is necessary to fulfil the purposes we collected it or as defined in the previous table. This includes for the purposes of satisfying any legal, accounting, reporting or regulatory requirements.

Data retention is defined by this policy and where appropriate by specific processes used in the course of contracted work. Once any data retention threshold is reached the data is removed permanently.

By law we have to keep basic information about our customers (including Contact details, Identity, Financial and Services Data) for a certain amount of time after they cease being a client of ours for tax and regulatory purposes.

In some circumstances you can ask us to delete your data: see the Request Erasure section below for further information.

Where data is stored

All information we collect from you is stored on secure servers, and where necessary for the purposes of delivering contracts stored on encrypted laptops and mobile phones.

We do not transfer your Personal Information outside the European Economic Area (EEA).

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this policy.

HOW WE PROTECT YOUR INFORMATION

We take all reasonable care to prevent any unauthorised access to your Personal Information.

We have put in place appropriate security measures to prevent your Personal Information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Information to those employees who have a business need to know.

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

Rights under GDPR

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 | 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 |

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|--|--|
| individual decision- making | |
|--|--|

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](#).

If you would like to exercise any of those rights, please email or write to us—see below: 'How to contact us'; and

let us have enough information to identify you e.g. your full name, business address and customer name.

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

When processing a request, we may ask for additional information to confirm that the request is legitimate to ensure that the security of the data is maintained, and data is not disclosed to a person who has no right to receive it.

We will try to respond and process all legitimate requests within one month. Occasionally it may take us longer than a month depending on the complexity or number of requests. We will keep you fully informed in all cases.

HOW TO CONTACT US:

To **Request Access** to your Personal Information (commonly known as a "data subject access request") please email [**support@primaryictsupport.co.uk**](mailto:support@primaryictsupport.co.uk).

To **Request erasure** of your Personal Information from our systems ("to be forgotten") please email [**support@primaryictsupport.co.uk**](mailto:support@primaryictsupport.co.uk).

For any other request under your rights, or if you have any questions about this Policy that are not answered above, or would like further information on how your information is used and how we maintain the security of your information, please email us.