

## PRIVACY POLICY

### Our Contact Details

<b>Name:</b>	Sandra Parry
<b>Company Name:</b>	SP Solutions Bangor, 24 Ballycrochan Avenue, Bangor, Co Down Bt19 7LA
<b>Registered with ICO</b>	Yes
<b>Phone Number</b>	07525379477
<b>Email Address</b>	<a href="mailto:sandra@spsolutionsbangor.com">sandra@spsolutionsbangor.com</a>

### **What type of information do we have?**

We currently collect and process the following information: -

- Personal identifiers, contacts, and characteristics (for example, name, email address, telephone number and occasionally your address i.e. basic contact details)
- We do not ask for personal sensitive data, unless required for SP Solutions Bangor's business with the client (for example, bank records if doing Bookkeeping)
- Information relating to the tasks within the Booking Form & Terms and Conditions of Business (T&Cs).

### **How we get the information and why we have it?**

Most of the personal information we process is provided to us directly by you for one of the following reasons: -

- Physical collection/delivery of paperwork required to conduct business in accordance with the Booking Form and T&Cs
- Electronic transfer of information via 'One Drive', email or 'Dropbox', as required to conduct business between ourselves
- We may also use your email address to contact you regarding offers, promotions or Newsletters which could be of interest and benefit to your business. (You are free to '**unsubscribe**' from these at any time either by using an unsubscribe link or by emailing us directly at the email address detailed above

We also receive personal information indirectly, from the following sources in the following scenarios: -

- Using CRM Software (Hubspot) which helps us collate details of individuals and businesses who are interested in our services.

## Lawful Basis for use: -

Under the General Data Protection Regulations (GDPR), the lawful basis we rely on for processing this information are: -

- Your consent
- We have a contractual obligation
- We have a legitimate interest

## What we do with the information we have: -

- We use the information that you have given us to conduct our business and fulfil our mutual contract.
- We **do not** share your information with any third parties, except in the case of our CRM Software Hubspot, as already indicated.

## How we store your information: -

We use several methods for storing data, all of which are necessary to conduct day to day business and to ensure flow in the event of equipment breakdown.

- Your information is securely stored in our cloud storage (One Drive)
- Dropbox may also be used to transfer and store data. This is accessible by both parties at any time. Information on Dropbox can be deleted upon request
- Contracts and hard copies are stored in a lockable business filing cabinet onsite
- An external hard drive is used to backup files on a weekly basis (this is essential storage for protection against equipment failure. This is also stored in a lockable cabinet)

We will keep your details on file for 1 year after our contract has finished unless otherwise required by law (i.e. Bookkeeping records), or specifically agreed with you to hold information longer.

We will then dispose of your information by permanently deleting all files from OneDrive and our Hard Drive. We will also remove your details from our CRM contacts unless otherwise agreed.

## Your Data Protection Rights: -

Under data protection law, you have the following rights: -

- **Your Right of Access** – You have the right to ask us for copies of your personal information.
- **Your Right to Rectification** – You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your Right to Erasure** – You have the right to ask us to erase your personal information in certain circumstances.
- **Your Right to Restriction of processing** – You have the right to ask us to restrict the processing of your information in certain circumstances.
- **Your Right to Data Portability** – You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charges for exercising your rights. If you make a request, we have one month to respond to you. Please feel free to use our contact details if you wish to make a request.

### HOW TO COMPLAIN

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