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# Privacy

# Statement

22/04/2022

## Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

#### **Responsibilities**

1. The HR Manager is responsible for ensuring that this notice is made available to data subjects prior to Sedcom Networks collecting/processing their personal data.

2. All Employees of Sedcom Networks who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

#### **Privacy notice**

#### Who are we?

At Sedcom we believe that people come first, our clients and staff are our number 1 asset. We value the relationships we have formed over the years with many of our clients being with us since our inception in 2005. Our staff drive the culture of being service centric. We regularly undertake Charity work as we take our Corporate Responsibility very seriously.

Our vision is simple – to be your trusted advisor in all things I.T. — Taking the technical stress away, so you can achieve more.

Our HR Manager and data protection representatives can be contacted directly here:

- (dpo@sedcom.net)
- (01277 633866)]

The personal data we would like to collect from you is:

Personal data type:	<b>Source</b> (where Sedcom Networks obtained the personal data from if it has not been collected directly from you, the data subject. Note if the personal data has been accessed from publicly accessible sources):
Full Name	
Business Email Address	
Business Phone Number	
Business bank details	

The personal data we collect will be used for the following purposes:

- To respond to queries made via our website
- To complete registration of you as a new client
- To fulfil contracted services, including processing of orders and collection of money owed

Our legal basis for processing for the personal data:

• Fulfilment of a contracted service with you

- To monitor performance of contracted services
- To build a business relationship

Any legitimate interests pursued by us, or third parties we use, are as follows:

- Fulfilment of support contract
- Required to allow us to recover debts owed to us

The special categories of personal data concerned are:

- Identity Information
- Contact data
- Financial data

# Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Sedcom Networks to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by emailing your account manager or DPO@sedcom.net.

# Disclosure

Sedcom Networks will pass on your personal data to third parties without first obtaining your consent. The following third parties will receive your personal data for the following purpose(s) as part of the processing activities

Third party	Purpose
Datto inc	Fulfilment of Support contract and
	monitoring of support services
Direct debit processor	For the collection of monies owed
Delivery company	Fulfilment of orders

# **Digital Marketing Service Providers**

We periodically appoint digital marketing agents to conduct marketing activity on our behalf, such activity may result in the compliant processing of personal information. Our appointed data processors include:

(i)Prospect Global Ltd (trading as Sopro) Reg. UK Co. 09648733. You can contact Sopro and view their privacy policy here: http://sopro.io. Sopro are registered with the ICO Reg: ZA346877 their Data Protection Officer can be emailed at: dpo@sopro.io."

# **Retention period**

Sedcom Networks will process personal data for the length of time necessary to fulfil our engagement with you and will store the personal data for:

Client Data	Retained for 2 years after termination of contract
Client Data (Financial)	Retained in line with UK Law
Prospective Clients	Retained during contact, deleted on request or 2 years after
	last contact

# Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

• Right of access – you have the right to request a copy of the information that we hold about you.

• Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.

• Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.

• Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.

• Right of portability – you have the right to have the data we hold about you transferred to another organisation.

• Right to object – you have the right to object to certain types of processing such as direct marketing.

• Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.

• Right to judicial review: in the event that Organisation Name refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

#### Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Sedcom Networks (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Sedcom Networks's data protection representatives HR Manager.

The details for each of these contacts are:

	Supervisory authority contact details	HR Manager contact details
Contact Name:	Information Commissioners Office	Jayne Sonnet
Address line 1:	Wycliffe House	Sedcom Networks
Address line 2:	Water Lane	92c High Street
Address line 3:	Wilmslow	Billericay
Address line 4:	SK9 5AF	Essex
Address line 5:		CM12 9BT
Email:	casework@ico.org.uk	DPO@sedcom.net
Telephone:	0303 123 113	01277 633866

#### **Privacy statement**

Read more about how and why we use your data here [provide a link to your privacy statement on the website].

#### **Online privacy statement**

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#### Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as: "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

#### How we use your information

This privacy notice tells you how we, Sedcom Networks, will collect and use your personal data for Managing our relationship with you ensuring that we are able to provide the services you have opted to take.

#### Why does Sedcom Networks need to collect and store personal data?

In order for us to provide you with your contracted service we need to collect personal data for detailed service provision. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes Sedcom Networks would contact you for additional consent.

#### Will Sedcom Networks share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Sedcom Networks in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with Sedcom Networks's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

# How will Sedcom Networks use the personal data it collects about me?

Sedcom Networks will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Sedcom Networks is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

#### Under what circumstances will Sedcom Networks contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

#### Can I find out the personal data that the organisation holds about me?

Sedcom Networks at your request, can confirm what information we hold about you and how it is processed. If Sedcom Networks does hold personal data about you, you can request the following information:

• Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.

- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.

• If the processing is based on the legitimate interests of Sedcom Networks or a third party, information about those interests.

- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.

• If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.

- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.

• Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.

• The source of personal data if it wasn't collected directly from you.

• Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

#### What forms of ID will I need to provide in order to access this?

Sedcom Networks accepts the following forms of ID when information on your personal data is requested:

[Passport, driving licence, birth certificate, utility bill (from last 3 months), etc.]

	HR Manager contact details		
Contact Name:	Jayne Sonnet		
Address line 1:	Sedcom Networks		
Address line 2:	92c High Street		
Address line 3:	Billericay		
Address line 4:	Essex		
Address Line 5:	CM12 9BT		
Email:	DPO@sedcom.net		
Telephone:	01277 633866		

#### Contact details of the HR Manager: