

# Privacy Notice – Transpeye LTD

We are a Security & Software Solutions Company , trading as Transpeye LTD (Company Number 10134154) (“we”, “us”, “our” or “Transpeye”).

Our registered office is at Unit 11, Poplars Farm Business Park, Earlswood, Solihull, West Midlands, B94 5JX.

We are committed to safeguarding your privacy. This policy - together with the PALS policies and procedures and any other documents referred to - sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Our privacy policy is fully compliant with GDPR (General Data Protection Regulation) which is intended to strengthen and unify data protection for all individuals within the EU.

For more information on GDPR, please access the following links:

<https://www.eugdpr.org/>

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

Transpeye is a “Data Controller,” which means that we are responsible for deciding how we hold and use personal information about you.

We are required - under data protection legislation - to notify you of the information contained in this privacy notice. It is important that you read this notice - together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you - so that you are aware of how and why we are using such information.

## **What information do we collect?**

We collect your personal data because it is necessary, in relation to taking steps to enter into a contract with you and/or performance of a contract with you. We may collect, store and use the following kinds of data:

### **• Information you give us:**

This is information about you that you give us by filling in forms on our site or by corresponding with us by phone, e-mail or otherwise.

The information you give us may include your name, address, e-mail address and phone number, financial and credit card information and personal description.

• **Information we collect about you:**

With regard to each of your visits to our site, we will automatically collect the following information:

- a. your IP address
- b. geographical location
- c. browser type
- d. referral source
- e. length of visit
- f. number of page views

• **Information we receive from other sources:**

We may receive your information when we work with third parties - including; business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers and credit reference agencies, for example. However, we will notify you when we receive information about you from them and the purposes for which we intend to use that information. We do not collect any sensitive personal data about you, such as information about your race, political opinions or religious beliefs - unless we obtain your explicit consent. In addition, we do not knowingly collect personal data from - or direct our content towards - those under the age of 16. How do we use your personal data? Personal data submitted on our site will be used for the purposes specified in this privacy policy.

**We may use your personal data to:**

- administer our site.
- carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us. This data will be used to ' protect premises, products, property and people' and we use the data to facilitate this purpose.
  
- provide you with information about other goods and services that we offer, which are similar to those that you have already enquired about or are certified for.
- send statements and invoices to you and collect payments from you.
- comply with our statutory and regulatory obligations.
- deal with enquiries and complaints made by or about you relating to the site.

Where you submit personal data for publication on our site, we will publish - and otherwise use - such data in accordance with the licence that you grant to us. You can withdraw your consent to any marketing emails, at any time, simply by emailing us at [info@pals-services.com](mailto:info@pals-services.com)

### **Disclosing your personal data to others**

We will not share your personal data with others, unless:

- we are under a duty to disclose or share your personal details in order to comply with any legal obligation, or in order to enforce or apply our rules.
- our business enters into a joint venture with, or is sold to or merged with, another business. We may then share your personal details with our new business partners or owners.
- we use third parties to carry out business activities and they require your personal details to do so. This may include analytics and search engine providers that assist us in the improvement and optimisation of our site.
- you have agreed to it being shared with third parties for relevant marketing activity, as per below. Where relevant, we will require that third parties follow our data protection and privacy policies and we will require that such third parties do not use your personal details for their own business purposes, without your prior consent.

### **Cookies**

Cookies are text files, placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track your use of a website and to compile statistical reports on website activity.

The Interactive Advertising Bureau (IAB) is an industry body that provides in-depth information about cookies. You can set your browser not to accept cookies and the IAB website tells you how to remove cookies from your browser.

However, in a few cases, some elements of our site may not function if you do not permit cookies from your browser(s).

We automatically collect and store the following information about your visit to our site:

- the internet domain and IP address from where you access our site.
- the type of browser software and operating system used to access our site.
- the date and time that you access our site.
- the pages you enter, visit and exit from our site.
- if you linked to our site from another site, the address of that site. The cookies we use are "analytical" cookies. They allow us to identify click stream patterns, to

improve our site and to learn about the number of visitors to our site – as well as the types of technology that our visitors use.

We only use this information to ensure that our site stays compatible with a selection of browsers and systems and to ensure that our site appeals to a wide audience.

### **Where we store your personal data**

We store all of your personal details on a secure server, within the European Economic Area.

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. Any payment transactions will be encrypted using SSL technology.

Where we have given you - or where you have chosen - a password that enables you to access certain parts of our site, you are responsible for keeping this password confidential.

### **Marketing**

You have the right to ask us not to process your personal data for marketing purposes. We will inform you - before collecting your data - if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data and you can also exercise the right - at any time - by contacting us at [info@pals-services.com](mailto:info@pals-services.com)

### **How long do we keep your personal data for?**

We only keep your personal data for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. 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 requirements.

## **How secure is my data?**

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, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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

## **Your rights**

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party. If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please write to us at

Transpeye LTD, Unit 11, Poplars Farm Business Park, Earlswood, Solihull, West Midlands, B94 5JX or email us at [info@pals-services.com](mailto:info@pals-services.com)

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

Your right to complain If you have any problems with the way that we are handling your personal data, you should contact the Information Commissioner's Officer (ICO). The ICO can be contacted by telephone on 0303 123 113 - Monday to Friday, between 9am and 5pm - or by email at [casework@ico.org.uk](mailto:casework@ico.org.uk).

You can also visit the ICO's website by following this link: <https://ico.org.uk/>.

### **Changes to our privacy policy**

We keep our privacy policy under regular review and any updates are posted on our site. This privacy policy was last updated on 13<sup>th</sup> April, 2018.

### **Data Controller**

The data controller responsible for your personal data are the Directors of Transpeye LTD (Company Number 10134154)

Our data protection registration number is **ZA216364**.

If you have any questions about this privacy notice or how we handle your personal information, please contact Transpeye LTD on 01564 703086