

Privacy Policy / Fair Processing Notice - Scoped Solutions Ltd

Introduction

This notice explains how we use your personal data, describes the categories of personal data we process and for what purposes. We are committed to collecting and using such data fairly and in accordance with the requirements of the General Data Protection Regulations (GDPR).

Summary

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Summary

Who we are

We are Scoped Solutions Ltd of Unit 3 Dominion Court, Billington Road, Burnley, BB11 5UB. Our Fair Processing Notice explains your privacy rights and how we gather, use and share information about you. You can get in touch with our Data Protection Officer by email at information@scopedsolutions.com or by post to the address above.

Your rights

You have the right to object to how we process your personal information. You also have the right to access, correct, sometimes delete and restrict the personal information we use. In addition, you have a right to complain to us and to the data protection regulator.

Section 3 gives you more information about your privacy rights.

How we gather personal information

In addition to the information you provide to us directly, we collect personal information in a number of ways for example from contact forms on our web site, incoming email and telephone enquiries, referrals from other companies or public domain trade body web sites and from looking at how your organisation has used other products and services we provide. Sometimes for your safety and for legal reasons we collect personal information by recording and monitoring calls and from CCTV. See section 5 for more details about how we gather personal information.

How we use your personal information

We use your personal information only in your capacity as a representative of an organisation which we may do business with, such that we can provide your organisation with products and services, to comply with the law and enforce our legal rights (including debt recovery), and to improve and market our products and services.

Our products and services

We may need some personal information before we can provide our products and services to your organisation, for example to allow us to check your identity or issue an invoice or create a user account. In some cases we won't be able to provide products and services to you if we don't have all the personal information we need. Find out more in section 7.

Sharing and transferring personal information

We may share personal information with our suppliers and other third parties where needed to provide your organisation with the best service. We also share personal information with regulators and law enforcement. We only transfer personal information to other countries outside the UK where we are legally obliged to do so.

Keeping personal information

We keep your personal information securely for as long as we need to for the purposes described in section 11.

Your consent

Sometimes we may need your consent to use your personal information. We won't always need consent to use personal information – for example if we need it to meet regulatory requirements or to perform a contract with you or for the purposes of our legitimate interests. Where you have given us consent, you have the right to withdraw it at any time. See sections 12 and 13 for more details.

Our partners

We want the best for our customers and sometimes we work with other companies to offer you the best products and services. We will only share personal information with a partner if it is necessary for them to perform their function. For example if we register a domain name on behalf of your organisation we may pass the required personal information to the domain registrar if it is required.

Full Fair Processing Notice

1 Introduction

- 1.1 We take your privacy seriously and you can find out more here about your privacy rights and how we gather, use and share your personal information – that includes the personal information we already hold about you now and the further personal information we might collect about you, either from you or from a third party. How we use your personal information will depend on the products and services we provide to you.
- 1.2 Our Data Protection Officer (DPO) provides help and guidance to make sure we apply the best standards to protecting your personal information. Our DPO can be reached by email at information@scopedsolutions.com or by post at Scoped Solutions Ltd, Unit 3 Dominion Court, Billington Road, Burnley, BB11 5UB if you have any questions about how we use your personal information.
- See section 3 'Your Privacy Rights' for more information about your rights and how our DPO can help you.
- 1.3 This Privacy Notice provides up to date information about how we use your personal information and will update any previous information we have given you about using your personal information (also referred to as personal data). We will update this Privacy Notice if we make any significant changes affecting how we use your personal information, and if so we will contact you to let you know about the change.

2 About us

We are what is known as the 'controller' of personal information we gather and use. When we say 'we' or 'us' in this Privacy Notice, we mean Scoped Solutions Ltd of Unit 3 Dominion Court, Billington Road, Burnley, BB11 5UB.

3 Your Privacy Rights

- 3.1 You have the right to object to how we use your personal information. You also have the right to see what personal information we hold about you. In addition, you can ask us to correct inaccuracies, delete or restrict personal information or to ask for some of your personal information to be provided to someone else. You can make a complaint to us by using the contact details in section 1.2 above.

You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, at <https://ico.org.uk>. To make enquires for further information about exercising any of your rights in this Privacy Notice please contact our DPO by post or email at the address given in section 1.2 above.

- 3.2 **Right to object:** You can object to our processing of your personal information. Please contact us as noted above, providing details of your objection.
- 3.3 **Access to your personal information:** You can request access to a copy of your personal information that we hold, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making.

You can make a request for access by contacting our DPO at using the details in section 1.2 above. A small administration fee may be levied, details will be provided by our DPO when you contact them.

- 3.4 **Right to withdraw consent:** If you have given us your consent to use personal information, you can withdraw your consent at any time and, update your marketing preferences using the contact details in section 1.2 above or by clicking the unsubscribe link in any of our marketing emails.
- 3.5 **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- 3.6 **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent and where we have no lawful basis for keeping it.
- 3.7 **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- 3.8 **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.
- 3.9 **Make a complaint:** You can make a complaint about how we have used your personal information to us, by using the contact details in section 1.2 above.

We will respond to your requests in accordance with our obligations under data protection law and in some cases may levy a small Administration fee, depending on the nature of the request.

4 What kinds of personal information we use

4.1 We use a variety of personal information depending on the products and services we deliver to you. For our all products and services we need to use your name, company name and address and contact details For some products and services we might need additional information, for example:

- details of other users within your organisation
- details about how your organisation operates so that we may better tailor our software to your needs.
- details of communications between ourselves and your organisation (for example emails) in order to carry out our obligations to you and better understand your needs or communicate information about our service.
- historical records of support requests, software bugs, feature requests, payment history for the purpose of providing improved service and managing financial risk.

4.2 Sometimes where we ask for your personal information needed to enter into a contract with you or to meet a legal obligation we will not be able to provide some products or services without that personal information. For example we cannot enter into a contract with you without your name, your company name and company address details and your contact details which we use for the purposes of invoicing and sometimes for credit checking.

5 How we gather your personal information

We obtain personal information:

- directly from you, for example when you fill out an application, order form, or in response to an email;
- by observing how you use our products and services;
- from other organisations such as credit reference and fraud prevention agencies;
- from other organisations who know you who may have referred you to us.

We also may obtain some personal information from monitoring or recording calls and when we use CCTV. We may record or monitor phone calls with you for training and to ensure and improve quality of service delivery, to ensure safety of our staff and customers, and to resolve queries or issues. We also use CCTV on our premises to ensure the safety and security of our staff and customers.

6 How we use your personal information

To provide you with any products and services we need to know your name, company address, contact details, company address details and sometimes details about the structure and operation of your company.

6.1 To operate and administer our products and services, including dealing with your complaints, fixing bugs and applying updates:

- (a) your contact details;
- (b) your user account settings (but not password)

6.2 To administer payments to and from you, we will use:

- (a) your contact details and the payment details that you have provided to us; and
- (b) your location data to enable us to verify locations at which payments are made for fraud prevention purposes. We may give this information to third party payment providers to process invoices.

6.3 To make credit decisions about you we will use:

- (a) information you give to us about your credit history;
- (b) information held about you or your company at Companies House

We use your information in this way to perform our contract with you, to reduce financial risk and and to meet our legal obligations.

6.4 To advise on the suitability of our software products and services, we will use:

- (a) information you give to us about your company structure, requirements and circumstances.
- (b) information about how you have used other software products and services which may be pertinent.
- (c) any other information about your company that you provide to us in order for us to better understand your requirements.

We might share all of the information we use for this purpose with third parties who help us to deliver the service. These third parties include subcontract developers, domain registrars, web design agencies, hardware providers, software service providers and web hosting providers.

6.5 To comply with our legal obligations, to prevent financial crime including fraud and money laundering we will use:

- (a) any information you have given us, that we have obtained from a third party, or that we have obtained by looking at how you use our services, where it is necessary for us to use that information to comply with a legal obligation; and
- (b) this information will include name, company name and address and information about any previous Directorships.

We will give information to and receive information from third parties where that is necessary to meet our legal obligations, including fraud prevention agencies, the police and other law enforcement and government agencies and regulators.

6.6 For financial management and debt recovery purposes, we will use:

- (a) your contact details;
- (b) information we obtain from looking at how you have used our services, including information about your location that we may find from reviewing your accounts; and

We will give information to and receive information from third parties where that is necessary to recover debts due by you to us, for example, debt recovery agents, credit reference agencies and sheriff officer or bailiff services. This might include passing personal information about you to a third party who we have transferred your debt to, and who will then contact you directly to collect that debt. If your debt is transferred to a third party you will be advised of the identity of that third party.

We use your information in this way because it is necessary to perform our contract with you, to exercise our legal rights, and because it is fair and reasonable for us to do so.

6.7 To carry out market research and analysis to develop and improve our products and services we will use:

- (a) information about how you have used our products and services.

6.8 To market products and services to you from us:

- (a) the contact details you have provided to us; and
- (b) information we have gathered from your use of our products and services.

We will pass your personal information to our service providers who help us with these marketing activities.

We might also receive personal information about you from a third party and use it to market our products and services to you, where you have given that third party your consent to share the personal information with us. We may collect your name and address from other service providers for the purpose of providing suitable marketing to you.

6.9 We will use personal information about key individuals in the business, so we can operate and administer the products and services which we provide to the business – to do this we will use:

- (a) personal information about key individuals who are either a sole trader of the business or are a proprietor, director, company secretary, shareholder, partner, member, committee member, trustee, controller, beneficial owner or authorised signatory to the account of the business.
- (b) the personal information we use about key individuals is as set out in section 6, and we may use it for any of the purposes described in section 6. We may hold personal information on key individuals for the purposes of operating and administering products and services which we provide to the business, as well as for the purposes of fraud and money laundering, for debt recovery purposes, and to make credit decisions about the business.

8 Our legal basis for using your personal information

8.1 We only use your personal information where that is permitted by the laws that protect your privacy rights.

We only use personal information where:

- (a) we have your consent (if consent is needed);
- (b) we need to use the information to comply with our legal obligations;
- (c) we need to use the information to perform a contract with you; and/or
- (d) it is fair to use the personal information either in our legitimate interests, where there is no disadvantage to you – this can include where it is in our legitimate interests to contact you about products or services, market to you, or collaborate with others to improve our services.

Where we have your consent, you have the right to withdraw it. Contact us using the details in section 1.2 for this purpose.

9 Sharing your personal information with or getting your personal information from others

- 9.1 We will share personal information within our Company and with others outside Scoped Solutions Ltd where we need to do that to make products and services available to you, market products and services to you, meet or enforce a legal obligation or where it is fair and reasonable for us to do so. See section 6 'How we use your personal information' for more information about how we do this. We will only share your personal information to the extent needed for those purposes.
- 9.2 Who we share your personal information with depends on the products and services we provide to you and the purposes we use your personal information for. For most products and services we will share your personal information with our own service providers such as our IT Suppliers, with credit reference agencies and fraud prevention agencies. See section 6 'How we use your personal information' for more information on who we share your personal information with and why.
- 9.3 Most of the time the personal information we have about you is information you have given to us, or gathered by us in the course of providing products and services to you. We also sometimes gather personal information from and send personal information to third parties where necessary for credit checking and fraud prevention or marketing purposes, for example so you can receive the best offers from us. See section 6 'How we use your personal information' for more information on who we get your personal information from and why.

10 Transfers outside the UK

10.1 We do not transfer your information outside the UK unless we are required to do so by law, for example as part of an international fraud investigation. Any information passed to IT providers outside the UK will not include personal data and will only relate to your company name and address and not to individuals.

11 How long we keep your personal information for

11.1 How long we keep your personal information for depends on the products and services we deliver to you. We will never retain your personal information for any longer than is necessary for the purposes we need to use it for.

We will not use your personal information for marketing purposes once you no longer have any active products or services with us unless you consent for us to do so. We keep the other personal information we use for seven years after closure of your account or from the date you last used one of our services. In some circumstances we will hold personal information for longer where necessary for active or potential legal proceedings, to resolve or defend claims, if required by HMRC and for the purpose of making remediation payments.

12 Keeping you up to date

12.1 We will communicate with you about products and services we are delivering using any contact details you have given us – for example by post, email, text message, social media, and notifications on our app or website.

12.2 Where you have given us consent to receive marketing, you can withdraw consent, and update your marketing preferences by contacting us using the details in section 1.2.

You can also update your contact preferences using the details in section 1.2.

13 Your online activities

13.1 We do not use cookies to track your activity.

13.2 We may use system logs, error logs and audit logs created by our systems to track system activity for the purposes of monitoring system performance, providing technical support and ensuring system usage is within contractually agreed limits.

13.3 We may use the methods in 13.2 to help us determine if other products or services would server you better. 13.4 We may use the methods in 13.2 , at your request, to verify the activity of your staff members in cases where you suspect malicious activity.