

Privacy Policy V1.2

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Introduction

Breen IT Solutions LTD trading as BespokeIT understands your concerns over the privacy of Personal Data you may provide to us as part of our day to day dealings with you.

This policy provides you with information about what types of information are collected, retention periods and other elements to comply with the EU Wide - General Data Protection Regulation and the UK's Data Protection Bill 2018.

If you have any questions about this Privacy Policy or our treatment of your Personal Data please contact using the details below.

If you are dissatisfied with this response you may request that your complaint be escalated, in which case it will be escalated to a member of the Breen IT Solutions Managing Director who will review your complaint and the initial response and provide a further response within 28 days of your request to escalate the matter.

If we are unable to resolve your complaint, you may make a complaint to the Information Commissioner's Office (if based in the UK, otherwise to your local Supervisory Body). Please see <https://ico.org.uk/for-the-public/raising-concerns> for more information.

Whilst this privacy policy sets out a general summary of your legal rights in respect of your Personal Data, this is a complex area of law and this privacy policy is not intended to represent legal advice. More information about your rights in respect of your Personal Data can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public>

We take data privacy and security seriously, as such we are certified with the following external certificates:-

- Cyber Essentials PLUS – Audited Version
 - <https://www.iasme.co.uk/cyberessentials/cyber-essentials-plus/cyber-essentials-plus/>
- Information Assurance for Small Medium Enterprises – Audited Version
 - <https://www.iasme.co.uk/audited-iasme-governance/>

Key Terms

The following terms are used or referred to in this privacy notice – as such it helps to be familiar with these core terms (amended version based on GDPR – Article 4): -

- *'Data Subject'* – The individual about who the data is held (you, or your employees in the case of a Company who have asked us to provide services on their behalf)
- *'Data Controller'* – company/individual that determines the purposes and means of the processing of personal data (typically this refers to us when we market to you, and your employer when they provide personal details about you). Generally, this refers to the individual/organisation that collects the data in the first place.
- *'Data Processor'* – Company/Individual which processes personal data on behalf of the controller. This is typically a company that provides services to your employer e.g. IT company.

- ‘Consent’ of the data subject means any freely given, specific, informed and unambiguous indication of the data subject’s wishes signifies agreement to the processing of personal data relating to him or her. This is typically used by us to provide marketing services to you.

Who we are

- Breen IT Solutions LTD Trading as BespokeIT
- Head of Data Privacy can be contacted at data@bespokeit.co.uk
- Telephone Number - 0151 701 0011
- Registered address of 166 Linacre Road, Litherland, Liverpool, L21 8JU

The information we collect

Personal Data is anything which identifies you as an individual, either on its own or by reference to other information. If you are engaging with us to provide services this also applies to any information you share with us.

Marketing

We will market to existing customers where the information/notification is related to existing services only and this will be on the legal basis of *performance of a contract or consent*

For sales related marketing activities - we will require consent and for you to take an affirmative action, furthermore you will have the option to opt-out (unsubscribe at any point). As per your rights – you may also object to direct marketing and we will cease all related activities (unless they impact our ability to deliver our contracted services to you – if you are an existing customer)

Data Processing where we are the Data Processor

We process the following personal data on the lawful basis of *Performance of a Contract* where the documented purposes of processing are to provide: -

- IT Support Services
- Resale of IT services and products e.g. Data Backup, Email Security, Hosted Email etc

Refer to our Data Processing Agreement for further information.

Data Item Name/Asset	Provided by
Key contact name Full Address (generally business address but in the case of a self-employed individual may be a home address) Email Address Mobile Phone Number	Data Controller themselves or their employer
Secondary contact details including	Employees as part of consultancy related services.
Sensitive data including Username/Passwords	Employees themselves
Logging of your client email addresses for email spam/av and relay services	Key contact
Client Emails hosted on our platform	Key Contact
Sensitive information including customer backups which are protected by complex passwords	Key Contact

Data Sharing/Third Parties (where we are the Data Processor)

We will only share data with suitably certified sub-contractors to help us deliver our core services, or service partners.

We may with your permission, share your contact details and other related information to third party consultants, if you have asked for an introduction, or on a joint project.

Data Processing where we are the Data Controller

We process the following personal data on the lawful basis of *Consent* or *Legitimate interests* where the documented purposes of processing are to provide: -

- Marketing services to our existing clients in relation to services we currently offer them
- Marketing services to prospects or existing clients for new services

Consent will be required to market to prospects or where we launch new products and wish to market to existing clients. Legitimate interests will apply for renewal updates to existing services that clients purchase from us

Data Item Name/Asset	Provided by
Email Address	Key contacts themselves or their employer or via LinkedIn from a connection approval/request.
Full Name	

Data Sharing (where we are the Data Controller)

We do not share personal data with any third parties, other than those listed below whom we use to help us to deliver our core services/products.

Other companies we use to help us deliver our services to you

We use the following data processors/companies to enable us to provide and deliver our services to you: -

All data is held in the UK or EU.

- Office 365 for Email related services
- Office 365 for File/Folder storage
- MessageStream for Hosted Email
- Cloudberry Backup for Client data backups
- Duo circle for Email SPAM and Security related protection
- Comodo for Email Spam and Security related protection
- Shadowprotect for Client data backups
- MyDocSafe for Electronic Signature Signing
- Xero based in the US to provide invoice payments
- GoCardless if you sign up for Direct Debit payment method
- Nfon for delivery of phone related services
- ITGlue for customer documentation storage
- Connectwise for Remote Tools and Ticketing Platforms

If we decide to change our services which process personal data we will request authorisation in advance, if we deem there is an increased security risk.

Retention Periods

As per data privacy best practices, we delete customer personal information as quickly as possible.

The following information is removed or transferred (to another IT provider) as soon as the clients contract ends: -

- Any hosted services including email
- Backups are deleted immediately upon contract cancellation
- Any other products/services which hold customer information
- Customer notes etc are transferred to the new provider or directly to the customer where appropriate – prior to deletion.

In the case of direct marketing activities, we retain clients email address and other contract information for up to 3 years from the date of last contact/consent.

Any payment/invoice related details including email address are kept as per HMRC guidelines which is 6 years plus the current tax year.

Your rights

As per GDPR Articles 12 to 23 you have rights associated with your data :-

If you require further details on your rights please contact us or alternatively find out more information from this public site <https://gdpr-info.eu/chapter-3/> (this is an external site not maintained by us) :-

1. **Right of access by the data subject** – Article 15. You (the data subject) shall have the right to obtain from the *controller* confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and related information.
2. **Right to Rectification** – Article 16. – from the *controller* without undue delay the rectification of inaccurate personal data concerning him or here
3. **Right to Erasure** – Article 17 – the right to obtain from the *controller* the erasure of personal data concerning him or her without undue delay – subject to suitable grounds.
4. **Right to Restriction of Processing** – Article 18 – the right to obtain from the controller restriction of processing where certain rules apply
5. **Right to notify any recipients** – Article 19 - where share data with in relation to the Articles 16,17 and 18 above.
6. **Right to data portability** – Article 20 – to receive personal data concerning him/her which they have provided to a *controller*
7. **Right to Object** – Article 21 – on grounds relating to his/her situation
 - where the lawful basis is legitimate interests.
 - applies to direct marketing purposes.