



Privacy Policy

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Introduction

Breen IT Solutions LTD trading as CyberSecuritiesUK 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>

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 CyberSecuritiesUK
- Head of Data Privacy can be contacted at data@cybersecurities.uk
- Telephone Number - 0151 363 5823
- Address
 - Champions Business Park
 - Upton
 - Wirral
 - CH49 0AB

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*.

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: -

- Compliance moderation for CyberEssentials and/or IASME Certification
- Ad-hoc Consultancy services relating to GDPR and related practitioner led services

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	Key contact themselves or their employer
Details on information you process on behalf of your clients this is generally collected as part of any ad-hoc consultancy Other key stakeholder names in the consultancy process.	Data Controller or their employees as part of consultancy related services.

<p>Details related to invoices namely: -</p> <p>Bank sort code/ Account Numbers (generally business address but in the case of a self-employed individual may be a home address)</p> <p>Contact Email Address where invoice will be sent to</p>	<p>Key contact at Employer</p>
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Data Sharing/Third Parties (where we are the Data Processor)

We will only share data with the third parties listed below and it is to help use issue certificates, enrol you on the assessment platform and provide internal/external consultancy.

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.

Cyber Essentials/IASME applicant information will be shared with the IASME Governance in order to provide your Certification. All data will be stored within the EU. Their contract details can be found here:- <https://www.iasme.co.uk/contact-us/>

Minimal contact details including email and if required address details will be shared with our Internal and External Practitioners/Suppliers to help us provide consultancy services on your behalf.

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: -

- Compliance moderation for CyberEssentials and/or IASME Certification
- Ad-hoc Consultancy services relating to GDPR and related practitioner led 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 and updates to compliance and other related actions for existing or legacy clients only.

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.

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

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.

- IASME
- MyDocSafe for Electronic Signature Signing
- Xero based in the US to provide invoice payments
- GoCardless if you sign up for Direct Debit payment method

If we decide to change our services which process personal data we will request authorisation in advance.

Retention Periods

As per data privacy best practices, we delete customer personal information as quickly as possible. However, in the case of assessment and consultancy based clients and their information – we retain it for up to 2 years months from the date of their last assessment/consultation.

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

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.