



We always complied with the highest standards regarding privacy matters. As of May 25th 2018, we are complying with the General Data Protection Regulation (GDPR), which strengthens the rights that EU individuals have over their personal data. However, we have always taken our customers' security and privacy seriously, both on cloud and on-premises implementations, providing a trustworthy infrastructure and features designed to protect the valuable information our customers entrust us. We know that your IT systems we manage through various software platforms are key to your business, and that is why we are committed to keeping it private and safe. You can trust we have made GDPR a priority and devoted strategic resources toward compliance.

### **We Care About your Data**

As Data Processors, we comply with the highest standards in privacy protection, including the latest regulations – in particular, GDPR.

Here are some examples of how we take care of data:

- We implemented appropriate technical and internal company measures according to GDPR, such as encryption of Data internally and in the cloud platforms we use in order to deliver IT Support services, among others.
- Platforms we use comply with Code of Conducts and have several certifications and accreditations, such as ISO 27001, ISO 27018, ISO 9001, SOC1, SOC2, SOC3, PCI DSS Level 1, and many more.
- We are committed to applying any other measure related to privacy or security required by the regulations.
- Cloud Management platforms we use are designed in such a way that they allow us to be compliant with GDPR.
- All data transfers comply with GDPR. These cloud platforms are within EU region and are managed by respective vendors-providers.

We have put in place commercially reasonable and appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data 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.

### **Processing Personal Information**

From a privacy perspective, we act as “Data Processors”, the Customer being the “Data Controller” who owns, manages, and controls all Data uploaded to their respective cloud platforms, for instance: [ AWS, Azure, Office 365 Sharepoint, Dropbox etc ] The Data Controller is responsible for the Data and for being compliant with the GDPR or any other applicable regulation. We do not know what data is uploaded - created by a Data Controller, since we do not access the Data, unless it is: reasonably necessary for providing our services (including managing hosting, managing backup, and other IT support activities we may be asked); authorised by a Data Controller – our client; or required by law.

### **HOW WE MAY COLLECT YOUR PERSONAL DATA**

- We obtain personal data about you, for example when:
- You request a proposal from us in respect of the services we provide;

- You or your employer or our clients engage us to provide our services and also during the provision of those services;
- You contact us by email, telephone, post or social media (for example when you have a query about our services);
- From third parties and/or publicly available resources (for example, from your employer or from Companies House).

#### **THE KIND OF INFORMATION WE HOLD ABOUT YOU**

The information we hold about you may include the following:

- Your personal details (such as your name and/or address);
- Details of contact we have had with you in relation to the provision, or the proposed provision, of our services;
- Details of any services you have received from us;
- Our correspondence and communications with you;
- Information about any complaints and enquiries you make to us;
- Information from research, surveys and marketing activities;
- Information we receive from other resources, such as publicly available information, information provided by your employer or our clients or information from members of our international association of firms.

#### **HOW WE USE PERSONAL DATA WE HOLD ABOUT YOU**

- We may process data for purposes necessary for the performance of our contract with you or your employer or our clients and to comply with our legal obligations.
- We may process your personal data for the purposes necessary for the performance of our contract with our clients. This may include processing your personal data where you are an employee, subcontractor, supplier or customer of our client.
- We may process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, business development, statistical and management purposes.
- We may process your personal data for certain additional purposes with your consent, and in these limited circumstances where your consent is required for the processing of your personal data then you have the right to withdraw your consent to processing for such specific purposes.
- Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

#### **Situations in which we will use your personal data**

We may use your personal data in order to:

- Carry out our obligations arising from any agreements entered into between you or your employer or our clients and us (which will most usually be for the provision of our services);
- Carry out our obligations arising from any agreements entered into between our clients and us (which will most usually be for the provision of our services) where you may be a subcontractor, supplier or customer of our client;
- Provide you with information related to our services and our events and activities that you request from us or which we feel may interest you, provided you have consented to be contacted for such purposes;
- Seek your thoughts and opinions on the services we provide; and
- Notify you about any changes to our services.

In some circumstances we may anonymise or pseudonymise the personal data so that it can no longer be associated with you, in which case we may use it without further notice to you.

If you refuse to provide us with certain information when requested, we may not be able to perform the contract we have entered into with you. Alternatively, we may be unable to comply with our legal or regulatory obligations. We may also process your personal data without your knowledge or consent, in accordance with this policy, where we are legally required or permitted to do so.

### **Data Retention**

We will only retain your personal data for as long as is necessary to fulfill the purposes for which it is collected.

When assessing what retention period is appropriate for your personal data, we take into consideration:

- The requirements of our business and the services provided;
- Any statutory or legal obligations;
- The purposes for which we originally collected the personal data;
- The lawful grounds on which we based our processing;
- The types of personal data we have collected;
- The amount and categories of your personal data; and
- Whether the purpose of the processing could reasonably be fulfilled by other means.

We retain Data as long as you remain our active client and as long as needed for providing the contracted support services.

In the event you want to cancel support contract, you can request the deletion of All your Personally Identifiable Data, and we will perform it within 15 (fifteen) days.

If you do not request the deletion of the Data, we will erase it within 2 (two) months after the cancellation of the mutual agreement.

**Access, rectification, deletion, and any other right** If you are an individual and you want to execute any of the rights granted by the GDPR and other regulations, you need to contact our Data Controller directly.  
privacy@itrescue.co.uk

We do not manage or control our Customers' Data, we only setup, configure and support 3<sup>rd</sup> party software systems or platforms our clients choose to use as their IT System. On premises or hosted.

### **Change of purpose**

Where we need to use your personal data for another reason, other than for the purpose for which we collected it, we will only use your personal data where that reason is compatible with the original purpose.

Should it be necessary to use your personal data for a new purpose, we will notify you and communicate the legal basis which allows us to do so before starting any new processing.

### **Use of Cookies**

Please see our Cookie Policy. We may store some information on your computer in the form of a "cookie" or a similar file. We use cookies for making the use of our website easier for you, and to improve your experience while you use it (for example, measuring the website performance).

### **Data Sharing**

#### **Why might you share my personal data with third parties?**

We will share your personal data with third parties where we are required by law, where it is necessary to administer the relationship between us or where we have another legitimate interest in doing so.

**Which third-party service providers process my personal data?**

“Third parties” includes the third-party service providers and other entities within our group or the members of our firm’s international association.

The following activities are carried out by third-party service providers:

IT and cloud services, Professional advisory services, Marketing services.

All of our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

**What about other third parties?**

We may share your personal data with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal data with a regulator or to otherwise comply with the law.

**TRANSFERRING PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)**

We may transfer the personal data we collect about you outside the EEA in order to perform our contract with you. This data will only be transferred with the express consent of you or your employer or our clients.

There is an adequacy decision by the European Commission in relation to these countries therefore they will be deemed to provide an adequate level of protection for your personal information for the purpose of the Data Protection Legislation.

**RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION****Your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us, using the contact details below.

**Your rights in connection with personal data**

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

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
- Request correction of the personal data that we hold about you.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data 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 basis. 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 data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible.

If you want to exercise any of the above rights, please email our data protection point of contact: [privacy@itrescue.co.uk](mailto:privacy@itrescue.co.uk) if you do not hear back from us within 24hrs please call or write to us. You will not have to pay a fee to access your personal data (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.

We may need to request specific information from you to help us to confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person which has no right to receive it.

#### **RIGHT TO WITHDRAW CONSENT**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to direct marketing that you have indicated you would like to receive from us), you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please email our data protection point of contact [privacy@itrescue.co.uk](mailto:privacy@itrescue.co.uk). Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

#### **CHANGES TO THIS POLICY**

Any changes we may make to our privacy policy in the future will be updated on our website at: This privacy policy was last updated on 25/05/2018.

#### **CONTACT US**

If you have any questions regarding this policy or if you would like to speak to us about the manner in which we process your personal data, please our Data Protection Point of Contact at [privacy@itrescue.co.uk](mailto:privacy@itrescue.co.uk) or telephone our Data Protection Officer on 0207 101 9660.

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time, the ICO's contact details are as follows:

Information Commissioner's Office

Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Telephone – 0303 123 1113 (local rate) or 01625 545 745

Website – <https://ico.org.uk/concerns>