

Customer Privacy Notice – Zen Systems Limited

Version:- 24th May 2018

What is the purpose of this document?

Zen Systems Ltd (Zen) is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the General Data Protection Regulation (GDPR).

Zen is a "data controller". This 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.

This notice does not form part of any contract to provide services that we have entered into with you. We may update this notice at any time.

It is important that you read this notice so that you are aware of how and why we are using such information.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data, which require a higher level of protection.

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, telephone number, e-mail address, postal address, mobile telephone number.
- Technical information in relation to your computer or other device, including the Internet protocol (IP) address used to connect your computer to the Internet, your

login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

- Information about your visits to our websites, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time), products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page;

The more sensitive “special categories” of data includes data such as information about race, ethnicity, religious belief, sexual orientation, political opinions, health, genetic or biometric information and information about criminal offences or convictions. Processing of this data is prohibited unless one of the additional grounds in Article 9 of the GDPR apply.

We do NOT currently collect, store or use any of the “special categories” of more sensitive personal information.

How is your personal information collected?

We collect personal information about you when you make an enquiry with us regarding our services (whether through our website or otherwise) and we will continue to collect personal information via our website, by email or letter, on the telephone or in person throughout our working relationship.

We may automatically collect information about you and your computer or device when you visit our website as set out above. Please refer to the Cookie statement included in our website privacy policy (<http://zen.systems/privacy-policy/>) for further information about the cookies used on our website. We may also sometimes collect additional information from third parties, including credit reference agencies or by acquiring mailing lists from third parties (which we will do strictly in accordance with the GDPR and other applicable regulations).

How we will use your personal information, and the legal basis for this

We need all the categories of information in the list above (see paragraph headed “The kind of information we hold about you”) primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal

information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests.

The specific situations in which we will process your personal information are listed below:

We will use your contact details and other information for the purpose of entering into and performing our contract with you. The basis for this processing will be that it is necessary for the performance of our contract with you or in order to take steps at your request prior to entering into such a contract.

We may use your name and email address to provide you with marketing information in relation to services supplied by us which we believe may be of interest to you. The basis for this processing will be that it is necessary for the purpose of our legitimate interests in ensuring that you are aware of the full range of products and services which we offer.

We will use your information to maintain our own administrative and accounting records and to fulfil related legal obligations to which we may be subject. The basis for this processing will be that it is necessary for compliance with legal obligations to which we are subject.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to enter into a contract with you or perform a contract we have entered into with you, or we may be prevented from complying with our legal obligations.

Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention.

At present we do NOT use Automated decision-making to process personal data.

Data sharing

We may need to share your personal information with third parties where required by law, where it is necessary as part of our working relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents).

We may share your data with third party processors who we engage to process your data on our behalf in order to allow us to provide our services to you.:-

We may also work with third party partners, who collect and process your data themselves as data controllers and share it with us. To the extent that these partners are responsible as data controllers for the collection and processing of your data you should refer to their privacy policies and terms of use when you register for their services.

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal information 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 information with a regulator or to otherwise comply with the law.

Transferring information outside the EU

We may transfer the personal information we collect about you to countries outside the EU in order to perform our contract with you. When we do so, we will determine whether there is an adequacy decision by the European Commission in respect of those countries or another lawful basis for the transfer under GDPR.

If, for any reason, we intend to transfer the personal information we collect about you to countries outside the EU for which there is no basis for transfer as above, we will write to you to advise you of the potential risks and to seek your explicit consent to the proposed transfer before it takes place.

Data security

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 that 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.

Data retention

We will only retain your personal information for as long as 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.

In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. If, for any reason, you cease to be a customer of the company, we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

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 contact us at the details below:-

- Alastair Howard-Dobson - Compliance Manager
- alastair@zensystems.co.uk
- 35 Lower Brook Street, Ipswich IP4 1AQ, +44 (0) 1473 760021.

No fee usually required

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.

What we may need from you

We may need to request specific information from you to help us 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 who 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 information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us using the details listed above (see paragraph headed "Your rights in connection with personal information"). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Compliance Manager

We have appointed a compliance manager to oversee compliance with this privacy notice or to answer any questions about how we process your personal information. Their details are listed above (see paragraph headed "Your rights in connection with personal information").

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.