

CIPHER-IT LTD GDPR PRIVACY NOTICE

In this document, “we”, “our”, or “us” refer to **CIPHER-IT LTD..**

Cipher-IT LTD company number **04097631** registered in England. Our registered office is at 5 The Quadrant, Coventry, West Midlands, CV1 2EL.

INTRODUCTION

1. This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you (“personal information”) and information that could not. In the context of the law and this notice, “process” means collect, store, transfer, use or otherwise act on information.
2. We take seriously the protection of your privacy and confidentiality. We understand that all customers are entitled to know that their personal data will not be used for any purpose unintended by us and will not accidentally fall into the hands of a third party.
3. We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.
4. Our policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).
5. The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. We do this now, by requesting that you read the information provided at www.knowyourprivacyrights.org
6. We do not share, or sell, or disclose to a third party, any information collected through our website or through our services except as set out in this notice.
7. We do not subcontract any of our Processing operations without prior written consent.

THE BASIS ON WHICH WE PROCESS INFORMATION ABOUT YOU

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data.

If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

1. INFORMATION WE PROCESS BECAUSE WE HAVE A CONTRACTUAL OBLIGATION WITH YOU

Currently our website www.cipher-it.co.uk is purely for information purposes. As yet there are no facilities for you to create an account through this website. However, in the future if you were to create an account on our website, buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

1. verify your identity for security purposes
2. sell services or products to you
3. provide you with advice on products, services and how to obtain the most from using our services

We will process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to a particular service we provide. If we use it for this purpose, you as an individual will not be personally identifiable.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

2. INFORMATION WE PROCESS WITH YOUR CONSENT

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including job opportunities, advice or you may fill out a contact form to request further information our products and services, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information

Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular service we provide.

Only if you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us. However we are subject to legal obligations.

3. INFORMATION WE PROCESS FOR THE PURPOSES OF LEGITIMATE INTERESTS

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data,
- and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

- record-keeping for the proper and necessary administration of our business.

- responding to unsolicited communication from you to which we believe you would expect a response
- protecting and asserting the legal rights of any party
- insuring against or obtaining professional advice that is required to manage business risk
- protecting your interests where we believe we have a duty to do so

4. INFORMATION WE PROCESS BECAUSE WE HAVE A LEGAL OBLIGATION

We are subject to the law like everyone else. Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order. This may include your personal information.

SPECIFIC USES OF INFORMATION YOU PROVIDE TO US

5. INFORMATION RELATING TO YOUR METHOD OF PAYMENT

We currently accept Direct Debit and BACS. We do not have access to any Bank Information as this is provided by the customer direct to their bank.

We also accept payments by Chip and Pin. No information is stored.

Currently we do not accept payment on our website. If at some time in the future we decide to do that we will not take Payment information. At the point of payment, you would be transferred to a secure page on the website of [WorldPay / SagePay / PayPal / MoneyBookers / Stripe] or some other reputable payment service provider.

6. JOB APPLICATION AND EMPLOYMENT

If you send us information in connection with an employment position, we may keep it for up to [one year] in case we decide to contact you at a later date.

If we decide to work together, we collect only necessary information about you and your activities from time to time throughout the period we work together.

This would be covered by a separate agreement we sign together.

7. SENDING A MESSAGE TO CIPHER-IT

When you contact us, whether by telephone, website or by e-mail, we collect the data you have given to us in order to reply with the information you need. We record your request and our reply in order to increase the efficiency of our business. We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high-quality service.

8. COMPLAINTS

When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other

person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is. We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

9. AFFILIATE AND BUSINESS PARTNER INFORMATION

This is information given to us by you in your capacity as an affiliate of us or as a business partner.

It allows us to recognise visitors that you have referred to us, and to credit to you commission due for such referrals. It also includes information that allows us to transfer commission to you.

The information is not used for any other purpose. We undertake to preserve the confidentiality of the information and of the terms of our relationship. We expect any affiliate or partner to agree to reciprocate this policy.

10. PERSONAL IDENTIFIERS FROM YOUR BROWSING ACTIVITY

Requests by your web browser to our servers for web pages and other content on our website are recorded. We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

11. OUR USE OF RE-MARKETING

We do not use affiliate marketing and our site is free of advertisements. If you see any advertising on this site or on email correspondence there is a strong chance your PC/Browser has been infected with Malware and we suggest you check that immediately. We can help provide further advice on this issue.

12. INFORMATION WE OBTAIN FROM THIRD PARTIES

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

No such information is personally identifiable to you.

13. THIRD PARTY ADVERTISING ON OUR WEBSITE

Third parties do not advertise on our website.

14. CREDIT REFERENCE

We do not share information with credit reference agencies.

15. DATA PROCESSING OUTSIDE OF THE EUROPEAN UNION

Our websites are hosted in England

We do not use outsourced services in countries outside the European Union

ACCESS TO YOUR OWN INFORMATION

Unless you have completed a contact form or have carried out business with us, we do not hold any personal information on you.

16. ACCESS TO YOUR PERSONAL INFORMATION

16.1. We do not collect personal information unless you specifically contact us or use a service that asks you to enter it. At any time you can decide not to submit your information. However, to obtain a copy of any information you may send us a request.

16.2. After receiving the request, we will tell you when we expect to provide you with the information.

17. REMOVAL OF YOUR INFORMATION

If you wish us to remove personally identifiable information from our records, you may contact us. This may limit the service we can provide to you.

18. VERIFICATION OF YOUR INFORMATION

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before taking any action. This is important to safeguard your information.

OTHER MATTERS.

19. PROTECTION OF YOUR DATA

We take protecting your data very seriously and have been assessed and accredited by IT Governance

19.1 We are assessed Annually for our Cyber Essentials accreditation.

19.2 All of our staff are trained by external specialists in GDPR and are very aware of current and potential cyber threats.

19.3 All Access to our Systems which hold any Company or Personal information utilizes 2 Factor Authentication.

19.4 All Backups of Data are encrypted

19.5 All our workstations/laptops are encrypted including all Portable USB Devices

19.6 We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us. Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

20. PERSONAL DATA BREACH

In the unlikely event of a data breach, we shall notify all customers involved without undue delay upon becoming aware of a Personal Data Breach affecting Personal Data, We would provide you with sufficient information to enable you to meet any obligations to report or inform Data Subjects of the Personal Data Breach under the Data Protection Laws. Such notification shall as a minimum:

- 20.1 describe the nature of the Personal Data Breach, the categories and numbers of Data Subjects concerned, and the categories and numbers of Personal Data records concerned;
- 20.2 communicate the name and contact details of our data protection officer or other relevant contact from whom more information may be obtained;
- 20.3 describe the likely consequences of the Personal Data Breach; and
- 20.4 describe the measures taken or proposed to be taken to address the Personal Data Breach."

21. HOW YOU CAN COMPLAIN

21.1. If you are not happy with our privacy policy or if have any complaint then you should tell us by email. Our address is *info@cipher-it.co.uk*

21.2. As mentioned previously we only process personal information if you contact us. However, if you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns/>

22. RETENTION PERIOD FOR PERSONAL DATA

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- 22.1. to provide you with the services you have requested;
- 22.2. to comply with other law, including for the period demanded by our tax authorities;
- 22.3. to support a claim or defence in court.

23. COMPLIANCE WITH THE LAW

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

However, ultimately it is your choice as to whether you wish to use our services.

24. REVIEW OF THIS PRIVACY POLICY

We may update this privacy notice from time to time as necessary.