



## Privacy Policy

### Key details

- Policy prepared by: Graeme Whyte
- Version Number: v1.05
- Approved by board / management on: 10/09/2021
- Policy became operational on: 10/09/2021

### Introduction

J7 (MIS) Ltd understands that the information you trust us with is important to you, and we are committed to protecting and respecting your privacy.

This policy explains how, when and why we collect your personal information during the course of providing services to you, under what situations we may disclose your personal information to others, and how we keep it secure.

### Why this policy exists

This privacy policy ensures J7 (MIS) Ltd:

- Complies with data protection law and follows good practice;
- Protects the rights of staff, customers and partners;
- Is open about how it stores and processes individuals' data;
- Protects itself from the risks of a data breach.

### Summary

- J7 (MIS) Ltd acts as a Controller and Processor of data.
- We only collect personal information about you where it is necessary to provide a business service or product; or you have consented, and we ensure that we only collect information that we need.
- We will not send you marketing material unless you have given us permission to do so.
- We will not sell your personal information to third parties.
- We use third-party suppliers to help us provide an excellent service to you. Where we share personal information with those suppliers, we have the appropriate contracts or controls in place, which will assess the security of their processing arrangements.
- We will protect your personal information with an appropriate combination of technical and organisational measures.
- You have rights to your information. These are detailed in Section 8. We retain your data for as long as is necessary. If you have a complaint, please see how to contact us in Section 11
- If you have any questions about how we process your information, please see how to contact us in Section 13.

### 1. What Information do we collect about you?

We need information about you to offer our range of services or to supply products.

We need to collect information from you to do this and to offer you the right product for your circumstances. This can include personal information about you and other people involved in fulfilment of the business dealings with you.

### 2. Why we use the information about you

We collect your personal information for a few reasons: to provide you with a quote; administer your business dealings with us; improve the products and services we offer; and inform you of other products or services that may interest you.

To process your information, we mainly rely on the following legal bases:

**Performance of a contract:** The use of your information is necessary to perform the contract that you, or a business you work for, has with us.

**Legitimate interests:** We may use your information for our legitimate interests, such as to provide you with the most suitable services, products, website experience, emails or newsletters, or to improve and promote our products and services, along with administrative and legal purposes.

**Consent:** We may rely on your consent to use your personal information for certain products or services, and for direct marketing purposes. You may withdraw your consent at any time, please contact us using the details provided at the end of this policy.

### 3. Information that we share

We may have to share your information with third-party service providers, including partners, in certain circumstances.

### 4. Marketing

We may from time-to-time send you technical bulletins or security advisories with the aim of keeping you informed of the latest technologies and risks. We will do this as part of our contract with you to provide products or services. We will not engage in Marketing activities outwith this remit. If you do not want to receive technical bulletins or security advisories then you have the right to request them to stop.

### 5. Information security

We work hard to keep your data safe. We use an appropriate combination of technical and organisational measures to ensure, as far as reasonably possible, the confidentiality, integrity and availability of your information at all times. If you have a security-related concern, please contact us using the contact details at the end of this policy.



**6. Transferring your information outside of the European Economic Area (EEA)**

J7 (MIS) Ltd does not have a requirement to transfer your personal data to countries outside the European Economic Area (EEA). Where there is a legitimate requirement to do so, the this will only be done after receiving your explicit consent to do so and ensuring any country has similar data protection laws to the UK.

**7. Information we collect through your use of our website**

We may collect information using cookies and similar technologies, to produce anonymised Google Analytics data to improve the website experience.

**8. Access to your information and correction**

- You have the right to request a copy of the information we hold about you. We will provide you with this information within 1 month of receiving your request and verifying your identity unless such data is restricted by law. Verification will require the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).
- You also have a right to contact us if you believe your personal information is incorrect, or if you believe we are no longer entitled to use your personal data.
- If you have any questions about how we use your personal information, please contact us using the details provided at the end of this policy.

**9. Retaining your data**

J7 (MIS) Ltd, and the information we collect about you, are subject to various regulatory and legislative requirements.

In addition, we will endeavour not to keep your personal information for longer than we should for us to fulfil our obligations to you. Where it is not possible for us to delete your data, we will ensure the appropriate security and organisational measures are put in place to protect the use of your data.

We will hold your personal data for differing periods of time depending upon the reason we have for processing it. These retention periods are set out below.

Type of Record	Retention Period
Client data file	Indefinitely

**10. Clients' data**

We will only collect such Personal Data that is necessary for us to perform our services and we ask our clients only to share such Personal Data as required for that purpose. Where we identify that a client has provided us with unnecessary Personal Data we will either return that information to its source or destroy it, taking into account our client's preference wherever possible.

Generally, we collect Personal Data from our clients or from third parties acting on the instructions of the relevant client. Examples of this collection include when: e.g.

- we are contacted about our services;
- a proposal is requested from us in respect of the services we provide;
- our clients engage us to provide our services and also during the provision of those services;

- from third parties (e.g. agents of our clients, or from corporate entities who employ Data Subjects) and/or publicly available resources (e.g. Companies House).

### **11. Complaints**

We work hard to ensure that your personal information is treated safely and securely.

However, if you have a complaint, write to us using the contact details at the end of this policy, or talk to us.

You also have the right to complain to the Information Commissioner's Office.

### **12. Changes to our privacy policy**

We review our Privacy Policy regularly and will place any updates on our website and in relevant policy communications.

### **13. Who to contact in relation to processing of personal information at J7 (MIS) Ltd**

J7 (MIS) Ltd controls the processing of personal data on its systems. If you would like to discuss anything in relation to this policy or how we handle your personal information, you can reach the Data Protection Officer for J7 (MIS) Ltd by writing to:

Data Protection Officer

J7 (MIS) Ltd

4 Farnell Way

Dunfermline

Fife

KY12 0SR

or via email to [info@j7mis.co.uk](mailto:info@j7mis.co.uk);

or you can also talk to us on 01383 728733.