

# **Privacy Notice**

# **Individual Strategies Limited - GDPR Privacy Notice**

Individual Strategies Limited (ISL) takes its obligations concerning data protection seriously. We are providing this notice, so you have information about how we collect and process your personal information. We ask you to please read this Privacy Notice as it has important information you need to know.

## What does our company do?

At ISL, we understand that change is not always easy. Since 2000, we have been helping companies of all sizes respond to industry transitions in order to stay competitive. Our team of experts develop strategies for companies across a vast range of industries to help them to not only remain competitive but to strive to be the best in their field.

# How do we use your personal information?

This privacy notice is to let you know how ISL promise to look after your personal information. This includes what you tell us about yourself, what we learn by having you as a client or customer, and the choices you give us about what you want us to send to you. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

# We promise:

- To keep your data safe and private
- To manage your data based on your rights
- Not to sell your data

# How the law protects you

As well as our privacy promise, your privacy is protected by law. Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing outside ISL. The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is in our legitimate interest, or
- When it is our legal duty, or
- When you consent to it

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what it is.

#### What information do we collect and process?

In order for us to work with you, it is legitimate and necessary to receive from your company or from yourself necessary personal data. "Personal Data" is information about you which, either on its own or when connected with other data, allows us to identify you as an individual customer to provide you with our services. The personal data we hold may include the following:

- Your full name and contact information (address, town, postcode, email and phone number)
- Your credit card details and/or bank account details (if paying by cheque or bank transfer)
- Your purchase details (including time, date and cost, and VAT status)
- Your proof of identity (valid driving licence and/or passport)
- Company Accounting information (due diligence checks)
- Your image on security CCTV around our offices
- Your work address and contact information
- Your calls and correspondence with us
- Your feedback

#### **Data Minimisation**

Data minimisation is a principle that states that data collected or processed should not be held or further used unless for essential reasons clearly stated in advance. This is defined as information that is adequate, relevant and limited to what is necessary for the purposes for which its processed. This approach represents best practice for reducing the risk of unauthorised access and maintaining customer trust.

When processing and collecting data from our clients and customers we ask ourselves the following questions:

- How are we planning to use the data?
- Is there a way of achieving the purpose without having to collect the data?
- Does the individual know we are processing or collecting the data?
- Does the individual know why we are processing or collecting the data?
- How long will we need the data for to achieve the purpose?

# If you choose not to give personal information

Please note that you are under no obligation to provide us with your personal information, but not providing certain data could prevent us from serving you, which could lead to cancellation of the service.

#### Why do we need your personal data?

ISL processes personal data about you for a number of purposes, including:

- To organise specialist repair functions such as system recalibration with contracted third parties
- To follow up with you shortly after we have provided our services to you to check everything is satisfactory
- For internal record keeping (to be able to respond to customer enquiry and invoicing)
- To make future appointments with you
- For number plate recognition as part of our customer service and site security
- To process payments by credit/debit card or bank account details
- To remind or update you of progress or completion date
- To provide our services to you as requested or agreed
- To help us improve the services we offer

This list is not exhaustive and may be updated from time to time. We do not 'trade' in your personal data and will not sell or rent your details.

## Who will your personal data be shared with?

ISL may engage with a third party in order to provide you the services we offer. We may share your basic personal data, such as name, contact details with the relevant company you are connected with to provide the service you have requested.

We may also disclose specific information upon lawful request by government authorities, law enforcement and regulatory authorities where required or permitted by law. Also in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. We store all the personal information you provide on our secure servers. All electronic transactions you make to or receive from us will be encrypted using SSL technology.

Data transmission over the Internet is inherently insecure and we cannot guarantee the security of data sent over the Internet. You are responsible for keeping your password and user details confidential and we will never ask you for your password.

In the event that we sell our business, we may share your details with the buyer to enable them to fulfil the service we have agreed with you.

Your personal information will not be transferred to, stored or otherwise processed outside the EU. Our data minimisation policy limits information to what is necessary for the purposes for which they are processed. International transfers of data between any of the countries we operate in is limited to operational and financial information. Personal information is not transferred.

## Do we get involved in direct marketing?

ISL does not take part in any direct marketing activities. We hope that the quality of our service and people will be enough for you to recommend us to others and view our website.

# What rights do you have to amend personal information?

You have the right to review the personal data held by us and have inaccurate information about you corrected. To understand more about our data processing activities or to request access to your personal information, please contact our customer support team via our website: <a href="https://www.individualstrategieslimited.com">www.individualstrategieslimited.com</a>

## What if you want us to stop using your personal information?

You have the right to object to our use of your personal information, or to ask us to delete, remove, or to stop using your personal information if there is no need for us to keep it. This is known and the 'right of erasure' or the 'right to be forgotten'. There may be legal, warranty related or other reasons why we need to keep or use your data, but please tell us if you think that we should not be using it.

## How long do we keep your personal information?

ISL will keep your details on record for as long as it is necessary to meet record keeping requirements. We hold booking, invoice and email details for seven years. They are then deleted in accordance with data protection and other applicable legislation. Should you wish to make a warranty claim after this period, you will need to provide a copy of our invoice or our completed guarantee.

#### **Website and Cookies**

We use Google Analytics to analyse the use of our website. Google Analytics generates statistical and other information about website use by means of cookies which are stored on user's computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information and their privacy policy is available at: http://www.google.com/privacypolicy.html

Personal information submitted on this website will be used for the purposes specified in this privacy notice or in relevant parts of our website. We may use your personal information to:

- Administer our website
- Improve your browsing experience by personalising the website
- Enable your use of the services available on our website
- Send you email notifications which you have specifically requested
- Deal with any enquiries and complaints made by or about you relating to the website

We will not provide your personal information to any third parties for the purpose of direct marketing.

#### **Contact Us**

If you have any questions about this privacy notice or our treatment of your personal information use the contact section on our website to get in touch <a href="https://www.individualstrategieslimited.com">www.individualstrategieslimited.com</a>

# **Changes to this Privacy Notice**

ISL may change this Privacy Notice from time to time in order to reflect changes in the law. This version was updated in May 2020.

End