



Privacy Notice

For General Users and
IT Support Customers



Introduction

Central Technology Ltd (“CT”) takes your privacy very seriously. This Privacy Notice is intended to set out your rights and answer any queries you may have about your personal data. If you need more information, please contact sales@ct.co.uk.

For personal data collected for General Users and IT Support Customers, the controller of your data will be CT. For users of our cloud services and other solutions CT will be a data processor – please see our separate data security policy for further details.

Our personal information handling procedures have been developed in line with the requirements of the 1995 European Union Data Protection Directive (Directive 95/46/EC) and the General Data Protection Regulation (in force from 25 May 2018) and applicable national law.

1. What information do we collect?

We collect and process personal data about you when you interact with us or our products as well as when you purchase goods and services from us. The personal data we process includes:

- your name;
- your username and password;
- administrator user names and passwords;
- your home or work address, email address and/or phone number;
- your job title;
- your payment and delivery details, including billing and delivery addresses if you make purchases from us;
- information related to the browser or device you use to access our website;
- internet browser and operating system;
- diagnostic information from your IT systems;
- software licencing details;
- recordings of calls you make to our customer service team;
- and/or any other information you provide
- the above data may be collected in relation to the primary contact AND all other members of your staff.

2. How do we use this information and what is the legal basis for this use?

We process the personal data listed in paragraph 1 above for the following purposes only:

- as required to establish and fulfil a contract with you, for example, if you enter into an agreement to provide or receive services. This may include verifying your identity, taking payments, communicating with you, providing technical support, arranging delivery or other provision of products or services. We require this information in order to enter into a contract with you and are unable to do so without it;
- to comply with applicable law and regulation;



- in accordance with our legitimate interests in protecting CT's legitimate business interests and legal rights, including but not limited to, use in connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation);
- with your express consent to respond to any comments or complaints we may receive from you, and/or in accordance with our legitimate interests including to investigate any complaints received from you or from others, about our website, products or services;
- we may use information you provide to personalise (i) our communications to you; (ii) our website; and (iii) products or services for you, in accordance with our legitimate interests;
- to monitor use of our websites and online services. We may use your information to help us check, improve and protect our products, content, services and websites, both online and offline, in accordance with our legitimate interests;
- if you provide a credit or debit card, we may also use third parties (such as POS payment providers) to check the validity of the sort code, account number and card number you submit in order to prevent fraud, in accordance with our legitimate interests and those of third parties;
- we may monitor any customer account to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law and our legitimate interests;
- we may monitor and log activity on your IT network in order to provide services under the contract;
- in circumstances where you contact us by telephone, calls may be recorded for quality, training and security purposes, in accordance with our legitimate interests; and
- we may use your information to invite you to take part in market research or surveys.

We may also send you direct marketing in relation to relevant products and services, CT company news or knowledgebase articles we believe may be of benefit to you. Electronic direct marketing will only be sent where you have given your consent to receive it, or (where this is allowed) you have been given an opportunity to opt-out. You will continue to be able to opt-out of electronic direct marketing at any time by following the instructions in the relevant communication.

3. With whom and where will we share your personal data?

We only share your personal data with third parties where it is required to fulfill our contractual or legal obligations to deliver our services and solutions to you. We may share your personal data with the below third parties:

- our professional advisors such as our auditors and external legal and financial advisors;
- marketing and communications agencies where they have agreed to process your personal data in line with this Privacy Notice;
- our suppliers, business partners, software providers, communication network providers and sub-contractors; and/or
- search engine and web analytics.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws. Personal data may also be shared with third party service providers who will process it on behalf of CT for the purposes above. Such third parties include, but are not limited to, providers of hardware and software support, software providers as well as identity checking providers.



In the event that our business or any part of it is sold or integrated with another business, your details will be disclosed to our advisers and those of any prospective purchaser and will be passed to the new owners of the business.

4. How long will you keep my personal data?

We will not keep your personal information for any purpose for longer than is necessary and will only retain the personal information that is necessary in relation to the purpose. We are also required to retain certain information as required by law or for as long as is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.

Where you are a customer, we will keep your information for the length of any contractual relationship you have with us and after that for a period of 12 months subject to legal and regulatory requirements as referred to above.

Where you are a prospective customer and you have expressly consented to us contacting you, we will only retain your data (a) until you unsubscribe from our communications; or, if you have not unsubscribed, (b) while you interact with us and our content; or (c) for 12 months from when you last interacted with us or our content.

We will retain your data for a short time beyond the specified retention period, to allow for information to be reviewed and any deletion to take place. In some instances, laws may require CT to hold certain information for specific periods other than those listed above.

5. Where is my data stored?

The personal data that we collect from you may be transferred to, and stored outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for one of our suppliers, in which case the third country's data protection laws will have been approved as adequate by the European Commission or other applicable safeguards are in place. Further information may be obtained from your account manager.

6. What are my rights in relation to my personal data?

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data, clicking the unsubscribe button on any communication we have sent to you or by contacting us.

Where you have consented to us using your personal data, you can withdraw that consent at any time.

If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.

You also have the right, with some exceptions and qualifications, to ask us to provide a copy of any personal data we hold about you.



If you have a complaint about how we have handled your personal data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved. In some circumstances you can ask us to erase your personal data (a) by withdrawing your consent for us to use it; (b) if it is no longer necessary for us to use your personal data; (c) if you object to the use of your personal data and we don't have a good reason to continue to use it; or (d) if we haven't handled your personal data in accordance with our obligations.

7. How we use cookies

We operate an implied consent policy. This means we assume if you visit the website with your browser set to accept cookies you are happy with their usage. If you are not happy you should not use the site or delete these cookies at the end of your visit.

What are cookies?

Cookies are small text files that are transferred by a website to your browser directory. They help the website identify your browser/device. They perform different tasks on a website, and certain aspects of the website will not function correctly without them. To find out more about cookies visit www.allaboutcookies.org

The cookies used on our website are:

Google Analytics

This gathers information about users, how they found and navigated the site as well as facts about which browsers they have used. The data gathered by this cookie is anonymous and is used to enhance the usability of the website. Further information is available from: <http://www.google.com/intl/None/policies/privacy>

Session cookies

Session cookies are used to remember you when you log in. Disabling these cookies will stop this functionality working. Further information about session cookies is available from: <http://www.allaboutcookies.org/cookies/session-cookies-used-for.html>

Links to other websites

Our website may contain links to enable you to visit other websites of interest easily. However, once you have used these links to leave our site we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy notice. You should exercise caution and look at the privacy notice applicable to the website in question.

8. Where can I find more information about CT's handling of my data?

Should you have any queries regarding this Privacy Notice, you can contact CT's Account Management Team using sales@ct.co.uk. If you are not happy with our response, you can contact the Information Commissioner's Office: <https://ico.org.uk/>