

Concero UK Limited

Privacy Notice

Last Updated: 18th March 2021

Introduction

Concero UK Limited and its affiliates, subsidiaries and related entities (“Concero”, “we, “our”) is committed to protecting the privacy and security of the personal data we collect about end customers and users of our services (“you/your”).

The purpose of this privacy notice is to explain what personal data we collect about you when [insert]. When we do this, we are the data controller.

Please read this privacy notice carefully as it provides important information about how we handle your personal information and your rights. If you have any questions about any aspect of this privacy notice you can contact us using the information provided below or by emailing us at [add email].

Personal data we collect

- Your first name
- Your surname
- Your School or Business Name
- Your job title
- Your email address
- Your telephone number
- Your postal address
- Your password and account details (if you create an account with us)
- An outline of your query which could contain further personal data
- Recommendations from existing customers and suppliers or other professional acquaintances which could contain personal data
- We retain any correspondence, queries and support requests that you may make which could contain personal data
- Technical information, including the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, device types and operating system
- We may also keep details of your visit to our website, such as traffic and location data
- Any other information that you choose to give to us via our website
- Sensitive data, such as that included in your CV

Purposes for which we use personal data and the legal basis

We will only use your personal data when the law allows us to and have outlined our legal basis for processing.

Performance of a Contract, whereby processing your data is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into a contract. Where we need to collect your personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested we may not be able to perform the contract we have or are trying to enter into with you, for example to provide you with goods or services. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time. We would endeavour to take all efforts to work with you and avoid this situation from occurring.

Legitimate Interest is the interest of our business in conducting and managing our business to enable us to give you the best service/product and the most secure experience. We make sure that we consider and balance any potential impact on you and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are permitted by law).

Comply with a legal or regulatory obligation means the processing of your personal data where it is necessary for the compliance with a legal or regulatory obligation that we are subject to.

Generally, we do not rely on **consent as a legal basis** for processing your personal data other than in relation to sending marketing communications.

We've listed below the ways we plan to use your personal data so you have a clear idea of what we do with it and why we ask for it, and the legal basis we rely on for these. We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using that data.

Purpose	Lawful Basis for Processing
To register your query or submission of interest with the Company and allow us to identify our service users	Performance of a contract with you
To register you as a new customer	Performance of a contract with you
To take efforts to ensure that we provide you with a high level of customer support, including dealing with any requests or ongoing queries you may have, conducted using a variety of communications (telephone, email, helpdesk and ticketing system)	Performance of a contract with you, or Legitimate interest of our business
Ongoing administration of the service to comply with any legal obligations we may have relating to the service	Performance of a contract with you, or Legal Obligation

Purpose	Lawful Basis for Processing
To manage the relationship with you and provide tailored support as part of the IT support service	Performance of a contract with you
To keep you informed of any changes we may make to the services you are subscribed to, such as (but not limited to) pricing or terms and conditions.	Performance of a contract with you
For ad hoc services such as accredited training (and certification)	Performance of a contract with you
Asking you to leave a review or take a survey	Legitimate interest of our business
So that we can offer you the best equipment and competitive prices	Based on Consent, or Legitimate interest of our business
Sharing some of your data with data with approved suppliers in order to quote and order on your behalf.	Legitimate interest of our business
To assist with installations, upgrades or IT recovery work at customer locations such as equipment installations (Audio Visual equipment, infrastructure or a client computer)	Performance of a contract with you
To administer and protect our business and the Company website (including troubleshooting, data analysis, website performance, testing, system maintenance, support, reporting and hosting of data). To protect, investigate and deter against unauthorised or illegal activity.	Legitimate interest of our business

Purpose	Lawful Basis for Processing
To use data analytics to improve our website, products and services, marketing, customer relationships and experiences	Legitimate interest of our business
To make suggestions and recommendations to you about goods or services that may be of interest to you.	Based on Consent, or Legitimate interest of our business
For product introductions with third parties	Based on Consent, or Legitimate interest of our business, or Performance of a contract with you
To report and investigate any network changes where a data subject may not be aware of the uses of their data and the data is not collected directly from the data subject but a software or system that is scanning all hardware and software connected to the network	Performance of a contract with you

Cookies

Our website uses analytics cookies for the purpose of tracking the performance of our website and understanding more about what is of interest to those who visit our website. We may log information using cookies which are small data files stored on your browser which store visitors' preferences and record user-specific information on what pages users access or visit.

We do not and will not ever use cookies to identify individuals and we do not store personal information in the cookies. We do not believe that our use of analytic cookies in this way poses any threat to your personal privacy or online security.

Sharing your data

Your data is a prime concern to us and we strive to use services that are as stringent as ourselves. We use several servers based in the UK, EEA and USA depending on the services, all of which are held in, either Tier IV or Tier III+, PCI DSS or ISO 27001 compliant facilities.

We have to work closely with a number of third-party organisations whose services we use within our websites and support packages, in order to run as a business and to provide you with a wider range of services.

We require all third parties to respect the privacy of your personal data and treat it in accordance with the law. We do not allow our third-party service providers to use your data for their own purposes and only permit them to use the data for a specified purpose in accordance with our instructions or

notification. Some third parties themselves may be acting as the Data Controller and providing information to us, and as such will have their own Privacy Notices which we are not responsible for.

We would advise you to read these as we do not accept any responsibility for any third party's use of your data or their use of cookies collected in this sense. Where links may be used to other websites, this does not imply that they are endorsed by Concero and may have been provided for your convenience. We have no control over the content of other websites.

If, however, it becomes necessary for the purposes of providing our services to you, that we share your personal data outside the UK, we will only share it with organisations in countries benefiting from a European Commission adequacy decision or on the basis of Standard Contractual Clauses approved by the European Commission which contractually oblige the recipient to process and protect your personal data to the standard expected within the UK and EU/EEA.

How long we keep your data

We will retain your personal data for as long as is necessary to provide you with our services and for a reasonable period thereafter to enable us to meet our contractual and legal obligations and to deal with complaints and claims.

At the end of the retention period, your personal data will be securely deleted or anonymised, for example by aggregation with other data, so that it can be used in a non-identifiable way for statistical analysis and business planning.

How we protect your data

We implement appropriate technical and organisational measures to protect data that we process from unauthorised disclosure, use, alteration or destruction.

Your rights and options

You have the following rights in respect of your personal data:

- You have the right of access to your personal data and can request copies of it and information about our processing of it.
- If the personal data we hold about you is incorrect or incomplete, you can ask us to rectify or add to it.
- Where we are using your personal data with your consent, you can withdraw your consent at any time.
- Where we are using your personal data because it is in our legitimate interests to do so, you can object to us using it this way.
- Where we are using your personal data for direct marketing, including profiling for direct marketing purposes, you can object to us doing so.
- You can ask us to restrict the use of your personal data if:
 - It is not accurate.
 - It has been used unlawfully but you do not want us to delete it.
 - We do not need it any-more, but you want us to keep it for use in legal claims; or
 - if you have already asked us to stop using your data but you are waiting to receive confirmation from us as to whether we can comply with your request.

- In some circumstances you can compel us to erase your personal data and request a machine-readable copy of your personal data to transfer to another service provider.
- You have the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

You will not have to pay a fee to access your personal data (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.

If you wish to exercise your rights, please contact us at [add email].

You can also lodge a complaint with the Information Commissioner's Office. They can be contacted using the information provided at: <https://ico.org.uk/concerns/>.

Contact us

If you have any questions, or wish to exercise any of your rights, then you can contact:

Concero UK Limited, Suite D, The Westlands, 132 Compton Road, Wolverhampton, WV3 9QB

Alternatively, you can email us at compliance@concerouk.com

Changes to this privacy notice

We may update this notice (and any supplemental privacy notice), from time to time as shown below. We will notify of the changes where required by applicable law to do so.

Last modified 18/03/2021.