

## Privacy Notice

Hugh Symons Information Management (HSIM) - ICO registration number Z5306895 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:

[GDPR@hughsymons.com](mailto:GDPR@hughsymons.com)

Our personal data handling policy and procedures have been developed in line with the requirements of the 2018 General Data Protection Regulation

### 1. What personal data do we collect?

We collect and process personal data about you when you interact with us and when you purchase services from us. The personal data we process includes:

- Name;
- Work address, email address and/or phone number;
- Job title;
- Any other personal data you provide.

### 2. How do we use this personal data and what is the legal basis for this use?

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

- To establish and fulfil a contract with you, for example, if you enter into an agreement to receive 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 HSIM's business interests with your express consent to respond to any comments or complaints we may receive from you, or to investigate any complaints received from you or from others, about our website or our products or services;
- We may use information you provide to personalise (i) our communications to you; and (ii) products or services for you, in accordance with our legitimate interests;
- 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;
- 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 HSIM's services but you will 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?

It is not our policy to share any personal data other than personal data may be shared with government authorities and/or law enforcement officials for legal or regulatory purposes, if mandated by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws.

#### **4. How long will you keep my personal data?**

We will not keep your personal data for any purpose, longer than necessary to fulfil the original or a compatible purpose. Where you are a customer, we will keep your personal data for the length of any contractual relationship you have with us and after that in accordance with our Data Retention Schedule following the completion of the contract.

Where you are a prospective customer and we have legitimate interest in contacting you, we will only retain your personal data for this purpose until you opt-out from our communications.

We may retain your personal data for a time beyond the specified retention period, to allow for information to be reviewed and any deletion to take place. After it is no longer necessary for us to retain your personal data, we dispose of it securely according to our Document & Information Retention Policy.

#### **5. Where is my data stored?**

The personal data that we collect from you will only be stored on our servers located in the UK, unless your contract with us specifically states otherwise (may be applicable to Cloud customers). Further information may be obtained from our Information Privacy Team on [GDPR@hughsymons.com](mailto:GDPR@hughsymons.com).

#### **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.

Where you have provided your data to us and it is processed by automated means, you may be able to request that we provide it to you in a structured, machine readable format.

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. Where can I find more information about HSIM's handling of my data?**

Should you have any queries regarding this Privacy Notice, about HSIM's processing of your personal data or wish to exercise your rights you can contact HSIM's Privacy Team using this email address: [GDPR@hughsymons.com](mailto:GDPR@hughsymons.com). If you are not happy with our response, you can contact the Information Commissioner's Office: <https://ico.org.uk/>