



**DATED 1<sup>ST</sup> MAY 2018**

## **PRIVACY POLICY FOR WEB USERS**

**SOUTH WEST SMART APPLICATIONS LIMITED**  
trading as Smart Applications Management

to outline how Smart Applications Management handle the Personal Data of its  
website users

# SMART APPLICATIONS MANAGEMENT

## PRIVACY POLICY FOR WEB USERS

Welcome to the privacy policy of Smart Applications Management [the trading name of South West Smart Applications Limited]. Smart Applications Management ("**We**") are committed to protecting and respecting your privacy.

This privacy policy applies to your use of our site [www.talktosam.co.uk](http://www.talktosam.co.uk) ("**our site**") and sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. This privacy policy also tells you about your privacy rights and how the law protects you.

Our site is not intended for children and we do not knowingly collect data relating to children.

Your acceptance of this privacy policy is deemed to occur upon your first use of our site. If you do not accept and agree with this privacy policy, you must stop using our site immediately.

### PERSONAL DATA

You may be asked to provide personal data whilst you are in contact with us. Personal data is information that can be used to identify or contact you. You do not have to provide the personal data that we request, however, if you choose not to, we may not be able to provide you with the services that you have requested.

If we combine personal data with non-personal data, the combined information will be treated as personal data for as long as it remains combined. Personal data does not include data where the identity has been removed (anonymous data).

For the purpose of the General Data Protection Regulations ((EU) 2016/679) and any national implementing laws, regulations and secondary legislation and the Data Protection Act 1998 ("**Data Protection Legislation**") the data controller is South West Smart Applications Limited a company registered in England and Wales with company registration number 07205882 whose registered office is at 14 High Cross, Truro, Cornwall TR1 2AJ. Our Data Protection Registration Number is ZA155790.

### INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- **Information you give us.** You may give us personal data by filling in forms on our site or corresponding with us by phone, email or otherwise. This includes information provided at the time of using our site, requesting services, using the 'Contact Us' page and when you report a problem with our site. The personal data you give us may include your name, address, e-mail address, phone number, business/company name and information about your business.
- **Information we collect from you.** With regard to each of your visits to our site we may automatically collect the following information:

- technical information, including the Internet protocol (“**IP**”) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- information about your visit, including the full Uniform Resource Locators (“**URL**”) clickstream to, through and from our site (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.
- **Information we receive from other sources.** We may receive personal data about you from various third parties and public sources. We work closely with third parties such as business partners, software providers, analytics providers and search information providers as well as have access to publicly available sources. Where necessary, we will notify you when we receive information about you from them and the purposes for which we intend to use that information.

When using our site, we do not collect any ‘special categories’ of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

#### **WHERE WE STORE YOUR PERSONAL DATA**

We do not store your personal data outside the European Economic Area (“**EEA**”).

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

#### **USES MADE OF THE INFORMATION**

We may use information held about you in the following ways:

- **Information you give us.** We will use your personal data:
  - to carry out our obligations arising from any contracts entered into between you and us (or about to be entered into between you and us) and to provide you with the information and services that you request from us;
  - to ensure that content from our site is presented in the most effective manner for you and for your computer; and

- to notify you about changes to our service;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and
- where we need to comply with a legal or regulatory obligation.
- **Information we collect from you.** We will use this information:
  - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
  - to improve our site to ensure that content is presented in the most effective manner for you and for your computer; and
  - as part of our efforts to keep our site safe and secure.
- **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

You have the right to withdraw your consent to us using your personal data (and to request that we delete it) at any time by contacting us.

## **COOKIES**

A cookie is a small file of letters and numbers that is stored on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive.

Our site does not currently use cookies. However, if we choose to use cookies in the future, we will change this privacy policy and inform you of the types of cookies used and the purpose for which we use them.

Please note that third parties may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

## **CHANGE OF PURPOSE**

We will ask for your consent before using personal data for a purpose other than those set out in this privacy policy, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you would like further information on purpose compatibility, please contact us.

## **DISCLOSURE OF YOUR INFORMATION**

You agree that we may disclose your information (including personal data) to the following categories of third parties:

- suppliers and sub-contractors for the performance of any contract we enter into with them or you;

- analytics and search engine providers that assist us in the improvement and optimisation of our site; and
- data storage providers, in connection with cloud storage and file hosting services.

Your personal data will not be shared with third parties for third party marketing purposes unless you have provided your express consent.

We may disclose your personal data to third parties:

- where we have your consent to do so;
- to provide and/or improve our services;
- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if Smart Applications Management or substantially all of our assets are acquired by a third party, in which case personal data held by us about you will be one of the transferred assets; and
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or to protect the rights of Smart Applications Management, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow third parties to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## YOUR RIGHTS

Under Data Protection Legislation, in certain circumstances you have the following rights in relation to your personal data:

- (a) **Right to access.** You have the right to request access to information held about you. We will provide you with a copy of your personal data held by us free of charge (providing your request is not excessive or for multiple copies, in which case we may charge a reasonable fee to cover our costs) and certain information about the processing of your personal data and the source of such data (if not directly collected from you by us). You also have the right to request that your personal data is transferred to a third party.
- (b) **Right to object to data processing.** You may withdraw your consent to the processing of your personal data at any time by contacting us. Upon receipt of your notification, we shall promptly stop any processing of your personal data and (if requested by you) erase such information if we are not required to retain it for legitimate business or legal purposes.

- (c) **Right to restrict processing.** You may ask us to suspend the processing of your personal data in the following circumstances:
- if you do not think your personal data is accurate;
  - where we are found to be processing unlawfully but you do not want us to erase your personal data;
  - where you need us to continue holding your personal data to establish, exercise or defend legal claims; or
  - you have objected to our use of your personal data but we need to verify whether we have overriding legitimate grounds to use it.
- (d) **Right of rectification and right of erasure.** You have the right to request that we correct or erase any inaccuracies in your personal data if such information would be incomplete, inaccurate or processed unlawfully.

Where we are relying on consent to process your personal data, you may withdraw consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

You can also exercise these rights at any time by contacting us at [contact@talktosam.co.uk](mailto:contact@talktosam.co.uk). We may reject requests that are unreasonable or require disproportionate effort (for example, such a request would result in a fundamental change to our existing practice) or risk the privacy of others.

Our site may, from time to time, contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **PERSONAL DATA RETENTION**

We may retain information about you, including personal data, for the period necessary to fulfil the purposes for which it was first collected unless a longer retention period is required or permitted by law. In determining data retention periods, we take into considerations contractual obligations, legal obligations and the expectation and requirements of our customers. When personal data is no longer needed, we will securely delete or destroy it.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **CHANGES TO OUR PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **CONTACTING US**

If you have any questions, comments or requests regarding this privacy policy or data processing or you would like to make a complaint, please contact us via email at [contact@talktosam.co.uk](mailto:contact@talktosam.co.uk), by telephone on 01752 977445, or by post to South West Smart Applications Limited, Ground Floor, 3 The Crescent, Plymouth, PL1 3AB.

If you have any cause for complaint about our use of your personal data, please contact us using the details provided above and we will do our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)).

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