# **EVOLVEMENT NETWORKS LTD PRIVACY POLICY**

Updated: 6<sup>th</sup> March 2019 V2.0

### Who We Are

**Evolvement Networks Ltd** gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

**Evolvement Networks Ltd** registered office is at **14 Trade Street, Cardiff CF10 5DT** and we are a company registered in England and Wales under company number **06857876**. We are registered on the Information Commissioner's Office Register; registration number: **N5**) **\$&'**, )**ž** and act as the **Data Controller** when processing your data. Our designated Data Protection Officer/Appointed Person is **James Lewis**, who can be contacted at:

Email: info@evolvement.net Telephone: 02920 509 074

### **Information That We Collect**

**Evolvement Networks Ltd** processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

#### The personal data that we collect from is: -

- Name
- Date of Birth
- Home Address
- Personal Email
- Business Email
- Home Telephone Number
- Mobile Telephone Number
- National Insurance Number
- Passport Number
- Driver's License Number

#### We collect information in the below ways: -

Online form, Website orders, Employment CV's & Employment Applications or Background Checks

### How We Use Your Personal Data

**Evolvement Networks Ltd** takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw

this consent at any time. The purposes and reasons for processing your personal data are detailed below: -

- We collect your personal data in the performance of a contract or to provide a service and to ensure that orders are completed and can be sent out to your preferred address
- We collect and store your personal data as part of our legal obligation for business accounting and tax purposes
- We will occasionally send you marketing information where we have assessed that it is beneficial to you as a customer and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests

## Your Rights

You have the right to access any personal information that **Evolvement Networks Ltd** processes about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (*where applicable*) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

## **Sharing and Disclosing Your Personal Information**

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. **Evolvement Networks Ltd** uses suppliers to provide services and business functions on occasions (Full list of processors available upon request); however, all processors acting on our behalf only process your data in accordance with instructions from us and the data protection safeguards that we set and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

### Safeguarding Measures

**Evolvement Networks Ltd** takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place.

# Transfers Outside the EU

**Evolvement Networks Ltd** utilise some products or services (*or parts of them*) that may be hosted/stored in the **USA**, which means that we may transfer any information which is submitted by you through the website outside the European Economic Area ("EEA") for the below purposes: -

#### **IT Services and Solutions**

Therefore, when you some of our services the personal information you submit may be stored on servers which are hosted in **USA**. Where this is the case, we will take steps to ensure that those providers use the necessary level of protection for your information and abide by strict agreements and measures set out by **Evolvement Networks Ltd** to protect your data and comply with the relevant data protection laws.

## Consequences of Not Providing Your Data

You are not obligated to provide your personal information to **Evolvement Networks Ltd**, however, as this information is required for us to provide you with our services and deliver your products and legitimate interests, we will not be able to offer some or all our services without it.

### Legitimate Interests

As noted in the 'How We Use Your Personal Data' section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

We use the legitimate interests' legal basis for processing employment contract and accounting information.

# How Long We Keep Your Data

**Evolvement Networks Ltd** only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your basic personal data for a minimum of 6 years after which time it will be destroyed.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

# Lodging A Complaint

**Evolvement Networks Ltd** only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

Evolvement Networks Ltd James Lewis 14 Trade Street, Cardiff CF10 5DT 02920 509 074 info@evolvement.net

ICO (Information Commissioners Office) https://ico.org.uk/

#### **Cookie Notice**

A '**cookie**' is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. When you visit a site that uses cookies for the first time, a cookie is downloaded onto your computer/mobile device so that the next time you visit that site, your device will remember useful information such as items added in the shopping cart, visited pages or logging in options.

Cookies are widely used in order to make websites work, or to work more efficiently, and our site relies on cookies to optimise user experience and for features and services to function properly.

Most web browsers allow some control to restrict or block cookies through the browser settings, however if you disable cookies you may find this affects your ability to use certain parts of our website or services. For more information about cookies visit <u>https://www.aboutcookies.org</u>.