

GDPR privacy notice

This Privacy Notice tells you what to expect in relation to personal information about you which is collected, handled and processed by Centrodoc Ltd.

Centrodoc Ltd of 7 AC Court, high Street, Thames Ditton, Surrey, KT7 0SR is the Data Controller and Processor.

We acknowledge and agree that any personal data of yours that we handle will be processed in accordance with all applicable data protection laws in force and with effect from 25 May 2018, the General Data Protection Regulations (“GDPR”).

the information we may hold about you

The information we may receive, collect, hold and process is set out below:

- your name
- your postal address(es)
- your email address(s)
- your telephone number(s)
- the company you work for
- your professional role
- a log of our communications from the site itself or with you by email and telephone

This information will have been provided, or will be provided, by you (by filling in forms or being registered on our site, or by corresponding with us by phone, e-mail or otherwise) or a third party who we work with,

Information we may we may automatically collect about you while visiting our website:

- 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;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time), services you viewed or searched for, page response times, download

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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 and any phone number used to call us.

By collecting this information, we ensure that content from the site is presented in the most effective manner for you and for your computer.

We will not collect sensitive categories of Subject data without explicit consent.

We will not collect data relating to minors as defined under UK law. Minors as defined by UK law are not permitted to interact with us as a corporate entity.

how your information will be used

The above information is used to provide our services to you, as our clients (and users of the system), or with you, as consultants / contractors (and users of the system) in connection with delivering our clients' projects. To provide you with marketing information about the services we offer or services you have consented to receiving and/or to notify you about changes to our services. We will never bombard you with marketing e-mails (which we limit to circa one a month).

using your information in accordance with data protection laws

Data protection laws require that we meet certain conditions before we can use your data in the manner described in this privacy policy. We take our responsibilities under data protection laws extremely seriously, including meeting these conditions. To use your personal data, we will rely on three conditions, depending on the activities we are carrying out:

consent: we may provide you with marketing information about our services where you have provided your explicit consent for us to do so.

contractual purposes: we may need to use personal data you have provided to us to fulfil our contractual obligations to you or because you have asked us to do something for you before entering into a contract (e.g. provide a quote or proposal)

legitimate interests: it is in our legitimate interests to collect your personal data as it provides us with the information that we need to provide our services to you more effectively. Effectively, this requires us to carry out a balancing test

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of our interests in using your personal data (for example, in order to provide you with the information, products and services that you request from us), against the interests you have as a citizen and the rights you have under data protection laws (for example, to not have your data sold to third party marketing companies without your knowledge, or store your personal data in insecure or unstable countries or regions). The outcome of this balancing test will determine whether we can use your personal data in the ways described in this privacy policy (except in relation to marketing, where we will always rely on your explicit consent). We will always act reasonably and give full and proper consideration to your interests in carrying out this balancing test.

There is no obligation upon you to provide us with any personal information however if you do provide information to us we will be better able to provide any information or services you require.

disclosure of information

Your information may be shared between the companies within the Francis Hunter Group and with other third parties in relation to projects you are contractually connected with or have legitimate interests in. Centrodoc does not sell any information for marketing purposes.

In limited and necessary circumstances, your information may be transferred outside of the EEA or to an international organisation to comply with our legal or contractual requirements.

We will only disclose your information to:

- business partners, suppliers and sub-contractors for the performance of any contract we enter with them or you;
- members of the Francis Hunter Group and third-party suppliers and service providers for the purposes listed under HOW WE USE YOUR INFORMATION above;
- analytics and search engine providers that assist us in the improvement and optimisation of our site and other selected third parties; and
- law enforcement or fraud prevention agencies, as well as our legal advisers etc.

We will disclose your personal information to third parties:

- if we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets;

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- if we, or substantially all our assets, are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets;
- to enforce or apply our website terms of use;
- to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction; and
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or regulatory requirements, or otherwise for the prevention or detection of fraud or crime.

We do not use automated decision making (including profiling).

how we hold your information

All the personal data we have is stored on our database in the UK, on a secured server and password protected computers.

how long will data be retained

Your personal data will be retained for no longer than is necessary and will be deleted as soon as possible after it is no longer required but in any event within 15 years.

your rights

You have the following rights:

1. the right to be informed (where we state in our privacy notice how we process information fairly)
2. the right of access (you can get access to, and a copy of, your data)
3. the right to rectification (you can ask us to update any inaccurate or incomplete data)
4. the right to erasure (commonly called 'the right to be forgotten'. You can ask us to delete or remove your personal data: as long as we no longer need it to achieve the purpose we collected it for; or where you withdraw your consent if we are using your personal data based on your consent; or where you object to the way we process your data - in line with Right 6 below).
5. the right to restrict processing (you can request us to store but not process personal data)
6. the right to data portability (allows you to get access to your data for your own personal use)

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7. the right to object (you can opt out of profiling based on your data, direct marketing to you, or using your data for research.)
8. the right in relation to automated decision making and profiling (although Centrodoc Ltd does not use automated decision making or profiling, you have protection rights against mistakes or decisions where humans are not involved in data processing)

If you would like to make a request for any of the above, please email support@centrodoc.com.

concerns

If you have a concern about the way we are collecting or using your personal data, we request you raise your concern with us in the first instance or directly to Information Commissioners Office at <https://ico.org.uk/concerns/>.