



## **OnIT Services Ltd Privacy Policy**

Your personal data is important to both you and us and it requires respectful and careful protection. This privacy policy informs you of our privacy practices and of the choices you can make about the way we hold information about you. We are committed to complying with the GDPR (2016) and the Data Protection Act (2018) and good business practices. We are both a data controller and a data processor.

This is our privacy policy so please be aware that should you follow a link to another website, you are no longer covered by this policy. It's a good idea to understand the privacy policy of any website before sharing personal information with it.

### **How we use your information**

At OnIT Services Ltd we will only collect the minimum personal information from you. This will be at the point you contact us, ask to be included on a newsletter, ask for further information or become a client. This could include your name, address, telephone numbers, email address, signature and bank account details. We need this information for legitimate, contractual or organisational purposes to provide you with the services that you have requested. We will not use your data for any other purpose unless we have obtained your consent for that specific purpose.

We need this information to process your requests and we do not regard it as excessive. Other relevant details that you provide in relation to the services you receive from us may be added to your data, but anything not required will be deleted immediately. We will not ask for any irrelevant information. We will not hold or process any special category personal data at any time. If your contact details change, please advise us and we will update our records accordingly. We do not carry out automated decision making or any type of automated profiling. We will always process your data in a fair and lawful way in accordance with article 5 and article 6 of the GDPR.

We regularly conduct data flows and a data inventory or data audit which looks at all aspects of the personal data that we process, including the legal basis for processing and any special requirements that the data needs. Any risk assessments (DPIAs) requirements are identified and completed paying particular attention to privacy risks associated with each processing activity: storage, collection, transmission, access and deletion.

We regularly complete Legitimate Interest Assessments to ensure that our marketing activities are considered, appropriate and are in accordance with all relevant legislation.

We will never knowingly collect data from or on children below 13 years old.

### **Data Security**

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. Your data maybe used by the OnIT Services Ltd team who have a legitimate business need to know such data. We will only process your personal data in accordance with our business processes where the safety of your data is paramount.

### **Who do we share your personal data with?**

We use third parties in conjunction with routine business requirements, accountancy and insurance services.

- With professional advisors such as accountants and insurance;

- In order to conduct checks on you to verify the information you have provided us with where you are being considered for a position or contract with us;
- In the event of a sale of the company or its assets;
- With suppliers but only subject to robust contractual protections;
- If we are legally obliged to do so.

We use third party providers and your details may be passed to them to assist us with system process such as invoicing, delivery or similar business-related activity. If we do need to share your data to a relevant third party other than providing business services, we will obtain your consent first.

Please note that we do not require your consent to share this information if we suspect criminal or unlawful activity, in these circumstances we will only contact the relevant organisations.

### **Data Breaches**

We have procedures in place to deal with any suspected personal data breach and will notify you and any supervisory body of a breach if we are legally required to.

### **Where your data is kept**

Your personal data will be held mainly within the EU but we will rely on the US privacy shield where required.

### **Retaining your data**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Our data retention policy considers the amount of data, its nature and sensitivity, the potential risk of harm from unauthorised use or disclosure, the processing purposes and if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for 5 years after they stop being customers. If you have had no communication with us for 6 years, we will delete all your personal information.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you. You will not be recognisable as a natural living person from this anonymised data.

If you contact us via our website, we assume that by contacting us you would like us to respond, your consent will be implied. In order to process your enquiry we need your contact details to do so.

### **Your Rights**

The GDPR provides the following rights for individuals:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

## Data Subject Access Requests

You have a right to see what information that we hold about you and you can get in contact with our Data Protection Officer at the following address: [helpdesk@onit.co.uk](mailto:helpdesk@onit.co.uk)

Under the GDPR you have the right to request a copy of the personal information OnIT Services Ltd hold about you and to have any inaccuracies corrected or information deleted. You will need to prove your identity with 2 pieces of approved identification which can be a: passport, driving licence, birth certificate, utility bill (from last 3 months), current vehicle registration document, bank statement (from last 3 months) or a rent book (from last 3 months). We will verify your identity, noting how and when we verified it, then we will immediately delete that data. We will send you a form which clarifies what information you are looking for and to verify your identity.

If you can advise of the specific information that you require, we can process your request more quickly. We will respond to your request within one month of you providing information that confirms your identity. You are obviously entitled to all your personal information.

We will respond within one month, giving you a copy of your data, why we have it, who it could be disclosed to, the categories of data it involves, and it will be in a format that you can access easily. You have the right to clarify and correct the information as necessary. It can be deleted providing that it is not required for legal or public interest reasons. If your request is more complex, for example it involves other data subjects and we need their consent to release the relevant information we can extend our response time to three months, but we will inform you of this. If they do not give their consent, we will anonymise this data or remove the relevant detail before sending this to you. We will not charge for data subject access requests unless they are excessive or manifestly unfounded. Then we will charge for administrative time only.

If you are not satisfied with our response to your data subject access request, please get in touch and we will do our best to help you: [helpdesk@onit.co.uk](mailto:helpdesk@onit.co.uk)

## Concerns

If you have any concerns about your data then please get in touch and we will do our best to help you: [helpdesk@onit.co.uk](mailto:helpdesk@onit.co.uk)

If you have any concerns about how your data is being used or processed and we have not been able to help you, then you can contact the ICO. Ways to report concerns are detailed on their website: <https://ico.org.uk/concerns/> .

If you have any questions, comments or ways we can improve please get in touch.

[helpdesk@onit.co.uk](mailto:helpdesk@onit.co.uk)