

SIGNUM CORPORATE COMMUNICATIONS LIMITED T/A SEMPERVOX.NET

Privacy Notice

SIGNUM CORPORATE COMMUNICATIONS LIMITED T/A SEMPERVOX.NET is committed to protecting the privacy and security of your personal information.

What is the purpose of this document?

This privacy notice describes how we collect and use personal information about our customers, suppliers and other third parties, in accordance with the General Data Protection Regulations (GDPR). This Privacy Notice applies to all Personal Data we Process regardless of the media on which that data is stored or whether it relates to past or present customers, clients or Supplier contacts, website or any other Data.

The Controller

SIGNUM CORPORATE COMMUNICATIONS LIMITED T/A SEMPERVOX.NET is the "data controller" and responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

The Data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer various kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, username or similar identifier, job title, marital status, title, date of birth and gender.
- **Contact Data** includes business billing address, business installation address, delivery address, email address and telephone numbers including mobile numbers.
- **Financial Data** includes business bank account details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, time zone setting and location, remote access to phone systems and routers, operating system and platform and other technology on the devices you use to provide you with service.
- **Profile Data** includes your username and password, purchases or orders made by you, fault history, feedback and survey responses.
- **Usage Data** includes data usage on your broadband or leased line connection and call data records.
- **Marketing and Communications Data** includes information about the prospects contact details, future requirements, current suppliers, branded products and consent information to receive marketing information.

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.

If you fail to provide personal Data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

How is your personal Data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - send a contact request on our website;

- subscribe to our service or publications;
- request marketing to be sent to you.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties:
 1. advertising networks such as LinkedIn and other social network platforms.
 2. search information providers such as Google.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services [such as CreditSafe and Marketscan based inside the EU].
- Identity and Contact Data from data brokers or aggregators such CreditSafe and Marketscan inside the EU.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.
- Purchased data from various data houses, all data is suppressed against the Telephone Preference Service (TPS) at purchase point and 28 days prior to contact.
- Contact information via referrals from existing customers and other third parties.
- Contact details through leads provided at business networking groups
- Details may be recorded by Account Managers when visiting customers of neighbouring companies but will be checked against the TPS prior to any contact.

How we use your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter or have entered with you.
- 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.

Where we need to comply with a legal or regulatory Obligation

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your Personal Data

We have set out below, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity, Type of data, Lawful basis for processing (including basis of legitimate interest):

- To register you as a new customer:
 - **Data required:**
 - (a) Identity
 - (b) Contact
 - **Lawful basis:** Performance of a contract with you.
- To Manage our relationship with you which will include:
 - (a) Notifying you about changes to our terms or privacy policy
 - (b) Asking you to leave a review or take a survey
 - **Data required:**
 - (a) Identity
 - (b) Contact
 - (c) Profile
 - (d) Marketing and Communications
 - **Lawful basis:**
 - (a) Performance of a contract with you.
 - (b) Necessary to comply with legal obligation.
 - (c) Necessary for our legitimate interests (to keep our records updated and to study how customers

use our products/ services).

- To process and deliver your order including:
 - (a) Manage payments, fees and charges
 - (b) Collect and recover money owed to us
 - **Data required:**
 - (a) Identity
 - (b) Contact
 - (c) Financial
 - (d) Transaction
 - (e) Marketing and Communications
 - **Lawful basis:**
 - (a) Performance of a contract with you.
 - (b) Necessary to comply with a legal obligation.
 - (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services).

- To enable you to partake in a prize draw, competition or complete a survey:
 - **Data required:**
 - (a) Identity
 - (b) Contact
 - (c) Profile
 - (d) Usage
 - (e) Marketing and Communications
 - **Lawful basis:**
 - (a) Performance of a contract with you.
 - (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business.

- To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data):
 - **Data required:**
 - (a) Identity
 - (b) Contact
 - (c) Technical
 - **Lawful basis:**
 - (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise).
 - (b) Necessary to comply with a legal obligation.

- To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you:
 - **Data required:**
 - (a) Identity
 - (b) Contact
 - (c) Profile
 - (d) Usage
 - (e) Marketing and Communications
 - (f) Technical
 - **Lawful basis:**
 - Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).

- To use data analytics to improve our website, products/services, marketing, customer relationships and experiences:
 - **Data required:**
 - (a) Technical
 - (b) Usage
 - **Lawful basis:**
 - Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).
- To make suggestions and recommendations to you about goods or services that may be of interest to you:
 - **Data required:**
 - (a) Identity
 - (b) Contact
 - (c) Technical
 - (d) Usage
 - (e) Profile
 - **Lawful basis:**
 - Necessary for our legitimate interests (to develop our products/services and grow our business).

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time by phone or email.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your Personal Data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph titled "Purposes for which we will use your Personal Data" above.

- Internal Third Parties such as contractors.
- External Third Parties - such as Internet Services Providers or the Network owners 'Openreach'.
- Other third parties such as owners of technical systems we use to provide service.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We have data agreements in place and we do not allow our third-party service providers 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.

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.

Access from Third Parties

Occasionally, we may receive a request for data from a mutual Third Party, for example, a software provider, or a CCTV company. We will never disclose any information to a third party, without prior written authorisation from an approved person within your company, and unless requested not to, we will change any login passwords, once the third party has completed the work the access was granted for.

Data Retention

How long will you use my personal data for?

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.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers including Contact, Identity, Financial and Transaction Data for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

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.

Your Legal Rights

You have the right to:

Request Access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request Correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request Erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to Processing of your personal data where we are relying on a legitimate interest or those of a third party and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request Restriction of Processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the Transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. 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 products or services to you. We will advise you if this is the case at the time you withdraw your consent

If you wish to exercise any of the rights set out above, please contact us in writing:

Data Protection Officer
Signum Corporate Communications Limited
Consort House
15 De Montfort Place
Leicester
LE1 7GZ

OR Via email: support@sempervox.net

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time Limit to Respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Your Data Abroad

We do not transfer or process data outside of the European Economic Area unless we have specific consent or where the nature of the processing requires it. For example, because you have chosen to use an email or other communication service which routes data outside of the EEA.

Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Who to Contact

We have appointed Mike Kapur to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact us.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

If you have any questions about this privacy notice, please contact support@sempervox.net or 0116 2520500