## Website Privacy Policy

### 1.0 OUR CORE BELIEFS REGARDING USER PRIVACY AND DATA PROTECTION

- User privacy and data protection are human rights
- We have a duty of care to the people within our data
- Data is a liability, it should only be collected and processed when absolutely necessary
- We loathe spam as much as you do!
- We will never sell, rent or otherwise distribute or make public your personal information

#### 2.0 RELEVANT LEGISLATION

Along with our business and internal computer systems, this website is designed to comply with the following national and international legislation with regards to data protection and user privacy:

- UK Data Protection Act 1988 (DPA)
- EU Data Protection Directive 1995 (DPD)
- EU General Data Protection Regulation 2018 (GDPR)
- Australian Privacy Act 1988 (APA)

This site's compliance with the above legislation, all of which are stringent in nature, means that this site is likely compliant with the data protection and user privacy legislation set out by many other countries and territories as well. If you are unsure about whether this site is compliant with your own country of residences' specific data protection and user privacy legislation you should contact our data protection officer (details of whom can be found in section 9.0) for clarification.

#### 3.0 PERSONAL INFORMATION THAT THIS WEBSITE COLLECTS AND WHY WE COLLECT IT

This website collects and uses personal information for the following reasons:

# 3.1 Site visitation tracking

**Google Analytics** 

Configurator

## Contact Form - email sent to data@itdeskuk.com - details not stored on website

Like most websites, this site uses Google Analytics (GA) to track user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to see their journey through the website.

Although GA records data such as your geographical location, device, internet browser and operating system, none of this information personally identifies you to us. GA also records your computer's IP address which could be used to personally identify you but Google do not grant us access to this. We consider Google to be a third party data processor (see <a href="section 6.0">section 6.0</a> below).

GA makes use of cookies, details of which can be found on Google's developer guides.

Disabling cookies on your internet browser will stop GA from tracking any part of your visit to pages within this website.

In addition to Google Analytics, this website may collect\* information (already held in the public domain) attributed to the IP address of the computer or device that is being used to access it.

## 3.2 Our blog

There is no option to post on our blog and is purely read only.

### 3.3 Contact forms and email links

Should you choose to contact us using the contact form on our contact us page none of the data that you supply will be stored by this website or passed to / be processed by any of the third party data processors defined in <u>section 6.0</u>. Instead the data will be collated into an email and sent to us over the <u>Simple Mail Transfer Protocol (SMTP)</u>. We would suggest that you always **consider email as an insecure medium** and not include personal, confidential or otherwise sensitive information within an email.

#### 3.4 Email newsletter

If you choose to join our email newsletter, the email address that you submit to us will be forwarded to <a href="MailChimp">MailChimp</a> who provide us with email marketing services. We consider MailChimp to be a third party data processor (see <a href="Section 6.0">section 6.0</a> below). The email address that you submit will not be stored within this website's own database or in any of our internal computer systems.

Your email address will remain within MailChimp's database for as long as we continue to use MailChimp's services for email marketing or until you specifically request removal from the list. You can do this by unsubscribing using the unsubscribe links contained in any email newsletters that we send you or by requesting removal via email. When requesting removal via email, please send your email to us using the email account that is subscribed to the mailing list.

If you are under 16 years of age you **MUST** obtain parental consent before joining our email newsletter.

While your email address remains within the MailChimp database, you will receive periodic (approximately one per month) newsletter-style emails from us.

#### 4.0 HOW WE STORE YOUR PERSONAL INFORMATION

As detailed in <u>section 3.2</u> above, if you submit a comment to a blog post published on this website some personal information will be stored within this website's database. This is currently the only occasion where personal data will be stored on this website. This data is currently stored in an identifiable fashion; a limitation of the content management system that this website is build on (WordPress). In the near future we aim to change the storage of this data to a pseudonymous fashion meaning that the data would require additional processing using a separately stored 'key' before it could be used to identify an individual. Pseudonymisation is a recent requirement of the GDPR which many web application developers are currently working to fully implement. We are committed to keeping it as a high priority and will implement it on this website as soon as we are able to.

#### 5.0 ABOUT THIS WEBSITE'S SERVER

This website is hosted by We Are Formed.

Some of the data centre's more notable security features are as follows:

- 3m rota-spike security fence and perimeter anti ram barriers
- Blast proof anti-intruder shielded external windows and doors
- Proximity access locks on all external and internal doors
- Interlocked man-trap doors with biometric iris scanners to gain access into data floors
- Server cabinets have locked doors (no open racks)
- Perimeter and internal IP CCTV system monitored 24×7
- 24×7 on-site security guards with static and mobile patrols
- All on-site personnel are security vetted to BS7858 standard
- Only authorised security cleared staff are allowed into the facility

All traffic (transferral of files) between this website and your browser is encrypted and delivered over <u>HTTPS</u>.

6.0 OUR THIRD PARTY DATA PROCESSORS

We use a number of third parties to process personal data on our behalf. These third parties

have been carefully chosen and all of them comply with the legislation set out in section 2.0.

All 3 of these third parties are based in the USA and are EU-U.S Privacy Shield compliant.

Google (Privacy policy)

Mailchimp (Privacy policy)

7.0 DATA BREACHES

We will report any unlawful data breach of this website's database or the database(s) of any

of our third party data processors to any and all relevant persons and authorities within 72

hours of the breach if it is apparent that personal data stored in an identifiable manner has

been stolen.

**8.0 DATA CONTROLLER** 

The data controller of this website is: IT Desk UK, a UK Private limited Company with

company number: 05773681

Whose registered office is:

IT Desk House,

2-6 Barnsley Road,

Rotherham,

S63 9NF

9.0 DATA PROTECTION OFFICER

Mr. Chris Wright

Managing Director, IT Desk UK Ltd.

Telephone: 01709 470073

Email: <a href="mailto:chris.wright@itdeskuk.com">chris.wright@itdeskuk.com</a>

10.0 CHANGES TO OUR PRIVACY POLICY

This privacy policy may change from time to time inline with legislation or industry

developments. We will not explicitly inform our clients or website users of these changes.

Instead, we recommend that you check this page occasionally for any policy changes.

Specific policy changes and updates are mentioned in the change log below.

May 2019 – 5.0 – Host changed from Sum. Agency to We Are Formed.