

INTRODUCTION

CD Support Ltd (“we” or “us” or “our”) are committed to protecting and respecting your privacy. This Policy (together with our terms and conditions and any other documents referred to on it) sets out the basis on which any personal data we collect from “you”, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the General Data Protection Regulation (“GDPR”), the data controller is CD Support Ltd of 272 Bath Street, Glasgow, G2 4JR. The information and data you provide in connection with the registration of the services of CD Support (the “services”) under the name of Company Dynamics, eGizmo and CD Support, will be processed in accordance with the provisions of the GDPR EU (2016/679) and Directive 95/46/EC.

We will comply with GDPR, which states that the personal data we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

INFORMATION WE COLLECT FROM YOU

We will collect and process the following data about you:

- Information you give us when making a purchase with CD Support, we will collect your contact information, which includes, name, address, email address, and phone number.
The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- If you contact us, we keep a record of that correspondence, for the purposes of communicating with you and record-keeping;
The legal basis for this processing is our legitimate interests, namely being able to contact you and keep our records up to date.
- Support requests where you require us to work with your data, where exporting and manipulation of sensitive information is required.
The legal basis for this processing is our legitimate interests, namely being able to assist you with your system and data problems.
- Other information to help us provide you with improved services.
The legal basis for this processing is our legitimate interests, namely our interest in the proper administration of our business and improving the services we provide to you.

This data will be collectively referred to as “personal data”. CD Support will only process personal data where it is strictly necessary to provide the services.

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

1. To help us identify you and the accounts you hold with us;
2. To provide customer care and system support;
3. To enable us to review, develop and improve our services;
4. To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request;
5. To provide you with information about goods and services we offer that are similar to those that you have already purchased or enquired about;

OTHER PROCESSING ACTIVITIES

In addition to the specific purposes for which we may process your personal data set out above, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of other persons.

Please do not supply any other person's personal data to us, unless we prompt you or you require to do so.

INFORMATION WE RECEIVE FROM OTHER SOURCES

CD Support work alongside third parties (including business partners, service providers, fraud protection services and your support services) and we may receive information from them about you. We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

DISCLOSURE OF YOUR INFORMATION

You agree that we have the right to share your personal data with:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act (2006).

Selected third parties including:

- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;

We will disclose your personal data to third parties:

- In the event that 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.
- If CD Support Ltd or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions and other

agreements; or to protect the rights, property, or safety of CD Support, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHERE WE STORE YOUR PERSONAL DATA

All information you provide to us is stored on our secure servers inside the European Economic Area (“EEA”). It will also be processed by staff operating inside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. CD Support will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this privacy policy.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of Your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

HOW LONG WE STORE YOUR PERSONAL DATA

We will retain your information for as long as needed to provide you with the services or as long as needed to fulfil the purpose for which the personal data was originally collected. We may also be required to retain certain information by law and/or for legitimate business purposes (for example, VAT records).

YOUR RIGHTS

You may instruct us to provide you with any personal data we hold about you, provided your request is not found to be unfounded or excessive, in which case a charge may apply. We may withhold personal data that you request to the extent permitted by law. You may instruct us at any time not to process your personal data for marketing purposes.

The rights you have under the GDPR are:

- The right to access;
You have the right to ask us to confirm whether or not we process your personal data and, to have access to the personal data, and any additional information. That additional information includes the purposes for which we process your data, the categories of personal data we hold and the recipients of that personal data. You may request a copy of your personal data. The first copy will be provided free of charge, but we may charge a reasonable fee for additional copies.
- The right to rectification;
If We hold any inaccurate personal data about you, you have the right to have these inaccuracies rectified. Where necessary for the purposes of the processing, you also have the right to have any incomplete personal data about you completed.
- The right to erasure;
In certain circumstances you have the right to have personal data that we hold about you

erased. This will be done without undue delay. These circumstances include the following: it is no longer necessary for us to hold those personal data in relation to the purposes for which they were originally collected or otherwise processed; you withdraw your consent to any processing which requires consent; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are certain general exclusions of the right to erasure, including where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for establishing, exercising or defending legal claims.

- The right to restrict processing;
In certain circumstances you have the right for the processing of your personal data to be restricted. This is the case where: you do not think that the personal data we hold about you is accurate; your data is being processed unlawfully, but you do not want your data to be erased; it is no longer necessary for us to hold your personal data for the purposes of our processing, but you still require that personal data in relation to a legal claim; and you have objected to processing, and are waiting for that objection to be verified. Where processing has been restricted for one of these reasons, we may continue to store your personal data. However, we will only process it for other reasons: with your consent; in relation to a legal claim; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- The right to object to processing;
You can object to us processing your personal data on grounds relating to your particular situation, but only as far as our legal basis for the processing is that it is necessary for: the performance of a task carried out in the public interest, or in the exercise of any official authority vested in us; or the purposes of our legitimate interests or those of a third party. If you make an objection, we will stop processing your personal data unless we are able to: demonstrate compelling legitimate grounds for the processing, and that these legitimate grounds override your interests, rights and freedoms; or the processing is in relation to a legal claim.
- The right to data portability;
You have the right to request that your personal data be moved, copied or transferred from one database, storage or IT environment to another.
- The right to complain to a supervisory authority;
If You think that our processing of your personal data infringes data protection laws, you can lodge a complaint with a supervisory authority responsible for data protection. You may do this in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- The right to withdraw consent;
To the extent that the legal basis we are relying on for processing your personal data is consent, you are entitled to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- the right to object to direct marketing;
You can choose whether we process your personal data for direct marketing purposes. If you do not want us to process your personal data for direct marketing purposes, we will not process your personal data for this purpose.

If you wish to:

Request access to, deletion of or correction of, your personal data. Please contact us to arrange this at privacy@cdsupport.co.uk

Complaints can be made to the Information Commissioners Office (“ICO”). The ICO website contains the processes for raising a complaint can be found here: <https://ico.org.uk/>. We would ask that where possible you contact us at privacy@cdsupport.co.uk in the first instance so we can attempt to resolve any issues you may have.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If You follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before You submit any personal data to these Websites.

COOKIES

Currently our website does not use cookies to distinguish you from other users of our website. However, if we start to do this, the purpose of this would be to help us to provide you with a good experience when you browse our website and also allows us to improve our site. If introduced, we will detail information on the cookies we use and the purposes for which we use them, in a Cookie Policy on our website.

SECURITY

We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of your information. Our security procedures mean that we may occasionally request proof of identity before we disclose any personal data to you.

Information entered through our website is encrypted and is protected with SSL. While on a secure page, the lock icon on the bottom of web browsers such as Netscape Navigator and Microsoft Internet Explorer becomes locked, as opposed to un-locked, or open, when you are just 'surfing'. While we use SSL encryption to protect sensitive information online, we also protect user-information off-line. All of our users' information, not just the sensitive information mentioned above, is restricted in our offices. Only employees who need the information to perform a specific job (for example, our accounting staff or a customer support staff) are granted access to personally identifiable information.

If you have any further concerns about security, please email our Customer Service team at help@cdsupport.co.uk

PERSONAL DATA MANAGED BY OUR CLIENTS

“**Client**” is the customer of CD Support Ltd to whom we provide the various services our business offers.

“**Client Customer Data**” is the personal data belonging to the parties with whom our client has a relationship. We have no direct relationship with the parties whose client customer data is processed by our Clients. If you are aware that your personal data has been provided to a client of ours who has a service with us, then please read this section of our privacy policy.

Our clients use the service to host, transmit or process data on our hosting platform and this, may include personal data of their own customers with whom they have a contractual relationship (Client Customer Data).

In this instance, it is our clients and not us who define the process and policies by which client customer data is collected and processed. We do not collect, view or share client customer data except as outlined in the agreement we have in place with our client to supply the services, or as required by legislation. Nothing contained in this privacy policy shall alter specific terms and conditions applicable to the Service agreement.

In line with the service agreement, our clients retain responsibility for setting standards and for managing security of all data they upload to our platform and that includes client customer data.

The security, including encryption of data prior to transmission to our network and confidentiality of their accounts and access to our platform, remains the responsibility of our clients.

To find out how client customer data is collected, stored and securely managed, and the process outlining how to gain access and/or to make changes, please refer to the privacy policy of the relevant CD Support client to whom you have provided your details or contact them directly. If you contact us with a request about your client customer data (for example, you may no longer wish to be contacted by one of our clients), we will pass on that request at the earliest opportunity.

We provide the services directly to our clients and have no direct relationship with the parties whose client customer data is processed by our clients. Our customers take responsibility for all client customer data that they process and for complying with relevant data protection legislation.

CHANGES TO OUR PRIVACY POLICY

Any changes we make to our privacy policy in the future will be posted on this page and where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to;

Contact: Stuart R Hunt – Technical Director
Address: CD Support • 272 Bath Street • Glasgow • G2 7JR
Email: privacy@cdsupport.co.uk
Telephone: 0333 370 1570