



GDPR & DATA PRIVACY POLICY

Defining Our Corporate Responsibilities for Data Protection

Policy Created: 25/05/18

DC-SERVICES LTD



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1. Outline of this Policy

This policy explains when, why and how we collect personal information from the people who visit our website, sign up or purchase any of our services or request or contact us in any other manner. The policy also details the conditions under which we may disclose the information to others and how we keep it secure.

While we encourage clients to read our privacy policy in full, we do have a number of guiding principles we operate our company by:

- We will never sell your data on.
- We will never share your data with any third party for their own marketing.
- We will always keep your personal data secure by using strong encryption, abiding by data protection rules and by implementing good security practice.
- We will never send you direct email marketing without your consent.

If you are ever concerned or have question about how your personal data is collected or used, please contact us at dpo@dc.services

2. About Us

DC-SERVICES LTD is a Limited company registered in England and Wales.

Registered Office:

Unit 10 Marbridge House,
Harold's Road,
Harlow
Essex
CM19 5BJ

Company number: 09362375

This policy (together with our terms of use 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 Data Protection Act 1998 (the Act) and GDPR (General Data Protection Regulation), the data controller is DC-SERVICES LTD, a company registered in England and Wales under company number 09362375 and with our registered office at Unit 10, Marbridge House, Harlow, CM19 5BJ

3. How we collect Data

We may collect data about you in the following ways:

- By filling in forms on any of our websites, this includes information provided at the time of registering to use our websites, subscribing to any of our services, posting material or requesting further services. We may also ask you for information when you enter a competition or promotion sponsored by us or if you report a problem with our site.
- If you contact us, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of transactions you carry out through our site and of the fulfilment of your orders.
- Visiting our sites, including, but not limited to, traffic data, location data and other communication data required for our own security, diagnostic, authentication and billing.

If you are simply viewing our website then we will collect the following information within our logs:

- IP Address (See cookies and IP addresses)

If your sign up to use our services then we will collect the following information:

- Name
- Address
- Email Address(s)
- Telephone number(s)
- IP address
- Payment details

While not actively collected we may store any other personal information that you may disclose during live chat, tickets or emails.

4. Cookies and Identification

IP Addresses

We collect IP address information for security (DDoS prevention, anti-hacking and fraud prevention), diagnostics and statistical analysis of traffic used for improvements to the performance and usability of our services, for GDPR purposes we collect this information under legitimate interest.

Cookies

A cookie is a small file saved on your computer that is used to help store preferences and other information that is used by websites you may visit.

We use cookies for the Following:

- Authentication of users when logging in or out of our services.
- Analysis of traffic to our website via Google Analytics (see Google Analytics).
- Tracking of website preferences.
- Third party services such live chat.

If you register with us or if you continue to use our site, you agree to the use of cookies.

You can block cookies by activating the setting in your browser which allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies you may not be allowed access to all or parts of our site.

Unless you have adjusted your browser settings so that it will refuse cookies, our system will issue cookies as soon as you visit our site.

5. Where is Your Data Kept

The data that we collect from you is stored in the UK but it may be processed by staff operating outside the EEA (European Economic Area) who work for us or for one of our suppliers. Such staff may be 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 the processing of this data outside of the EEA.

We take all steps necessary to ensure that your data, regardless of where it is processed, is treated securely and in accordance with this privacy policy and the GDPR (General Data Protection Regulation)

6. How we Protect Your Data

We treat all data with the utmost care and take appropriate steps in compliance with data protection regulation to ensure it is kept safe.

- All data we collect is done so over encrypted connections (https).
- All data is stored behind state of the art firewalls, managed by our security team.
- All data is access controlled to ISO27001 standards.
- All systems storing personal data have access logging.
- All passwords are encoded by strong ciphers at rest.
- All systems are subject to regular penetration testing and are monitored for vulnerabilities and attacks.
- All employees and contractors receive regular audits and activity logged by our access control systems.
- All data transferred between datacentres, mesh networks and clients are secured in transit by very strong ciphers. This is through the use of VPN technology.
- We ensure the use of secure protocols for any DCServices internal and external systems.

7. When will we Use Personal Data

We use information held about you in the following ways:

- To verify your identity.
- To provide you with the products and services you have purchased from us.
- To carry out our obligations arising from any contracts entered into between you and us.
- To ensure that content from our site is presented in the most effective manner for your device.
- To respond to queries.
- To provide you with information, products or services that you request from us where you have consented to be contacted.
- To notify you about changes to our service.
- To send you marketing emails where you have given **explicit** consent.
- To display personalised Ads from us.
- To prevent fraud.
- To detect, prevent and diagnose potential security breaches.

8. Legal Basis for Collection and Processing of Data

Data protection law sets out the conditions under which personal data can be collected and which we use as the basis for collection and processing, these include:

Contractual obligations

When you purchase a service, we need to collect personal data to fulfil our legal contractual obligation, for example: so we can manage and invoice your account and contact you for technical support purposes.

Legal compliance

The law requires we collect and process data for certain purposes such as for keeping financial records (i.e. invoicing) and that we can comply with law enforcement requests for data.

Legitimate interest

We collect data under legitimate interest in a way that is reasonably expected as part of the day to day running of our business.

For example, we collect and log IP addresses for fraud protection and security as well as analysis of our site usage.

Consent

In certain cases, we may collect and process your data with your consent, for example our newsletter and hot offers emails. Consent to receive these can be withdrawn at any time.

9. Retention of Data

Your data will be kept until it is no longer required for the purpose of its collection.

At the end of the retention period the data will either be deleted or anonymised so it can no longer be linked back to an individual.

Personal data linked to purchases or any other financial transaction are kept for a minimum of 7 years as required by UK law to retain financial data.

10. Who we share Data with

Like many websites or technical services, we use a number of third-party services for functionality such as email sign-up and payment processing.

The following is a list of companies we share data with on a day to day basis. This list does not include services we share anonymous data with or that provide services on an ad-hoc basis such as IT contractors. All the suppliers below have been carefully selected to ensure they provide suitable protections under GDPR.

Stripe

Stripe is used to provide secure credit and debit card processing services. If you choose to pay by this method then your card details, name, address and email will be transmitted to Stripe securely for the processing of payment and for fraud prevention.

If you choose to store your card details then this will be saved alongside your name, address and email on Stripe's servers.

Privacy Policy: <https://stripe.com/gb/privacy>

GoCardless

Stripe is also used to provide secure direct debit services. If you choose to pay by this method then your bank account details, name, address and email will be transmitted to GoCardless securely for the processing of payment and for fraud prevention.

If you choose to store your card details then this will be saved alongside your name, address and email on Stripe's servers.

Privacy Policy: <https://gocardless.com/legal/privacy>

Microsoft

We use Microsoft Office 365 for document storage, email and collaboration. In some instances your personal data may be stored on Office 365 servers, any data stored there is encrypted at rest and is controlled by us.

Privacy Policy: <https://www.microsoft.com/online/legal/v2/?docid=43>

11. Google Analytics

Like many websites we use Google Analytics to collect anonymous data about the users of our sites such as how often they visit, what pages they visit, what time they visit, how long the stay and what country they are visiting from.

This data is collected using cookies and from your IP address, the resulting statistics are used for the following purposes:

- Improving website usability
- Tracking the success of marketing campaigns
- Pattern analysis

You can prevent Google Analytics from collecting this information by installing the google opt-out browser addon: <https://tools.google.com/dlpage/gaoptout>

To learn how Google uses data collected from our own and partner sites please see the following link: <https://policies.google.com/privacy/partners?hl=en-GB&gl=uk>

12. Marketing Emails

All our marketing emails are opt-in, we will never sell on your details or pass them on to third parties for marketing purposes. If you have opted in to receive these then you can opt out at any time in one of two ways:

1. If you have received an email, click on the unsubscribe link located in the email footer.
2. By contacting our customer services department.

13. Disclosure of your Personal Information

We may disclose your personal information to 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.

We may disclose your personal information to third parties:

If DC-SERVICES LTD or substantially all of its assets are acquired by a third party, in which case personal data held by it (DCServices) 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 of supply Terms and Conditions and other agreements; or to protect the rights, property, or safety of our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

14. References and Links to Other Websites

Our site may, from time to time, contain links to and from the websites of our partners. 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.

15. GDPR and Your Rights

Under GDPR (General Data Protection regulation) you have a number of rights relating to your personal data, these will come into force on the 25th May 2018, for further information please see <https://ico.org.uk>

Right to Restrict Processing

You have the right to request the restriction of processing your personal data where there is no legitimate interest for us to do so:

- Where the accuracy of the personal data is contested, to restrict the processing until such time as the accuracy has been sufficiently verified.
- Where you object to the processing (See Right to Object), and where we are considering whether there are legitimate grounds to override the request.
- When processing is unlawful and you oppose erasure and request restriction instead.
- If we no longer need the personal data but you require the data to establish, exercise or defend a legal claim.

You can exercise the right at any time by contacting our team (see Contacting Us).

Right of Access (Access to Information)

The GDPR Act gives you the right to access information held about you.

You can exercise this right by contacting us (see Contacting Us).

We are required to verify your identify before processing any right to access request, once verified the data shall be provided within 28 days.

The data shall be provided free of charge however an admin fee may be applied where a request is manifestly unfounded or excessive, particularly if it is repetitive.

Right to Erasure (Also known as the right to be forgotten)

As an individual you have the right to request the erasure of any data we hold on you, this is not an absolute right, for example it does not override our requirement under UK law to keep financial data such as invoice information.

You can make a request where your personal data is no longer necessary in relation to the purpose for which it was originally collected/processed, for example if you cancel all services you have with us.

To make a right to erasure request please contact our customer services team (see Contacting Us).

Right to Rectification

The GDPR provides the right to have any personal data rectified that may be incorrect or incomplete.

Customers can update their own personal details via the client area however if this is not sufficient please contact our customer services team (See contacting Us).

Right to Object

You have the right to object to the processing of your personal data where there is no legitimate or lawful reason to do so.

To make a right to object request please contact our customer services team (see Contacting Us).

16. Changes to This Policy

We keep our privacy policy under regular review, you can always find the latest version at the URL below:

<https://dc.services/privacy-policy>

17. Contacting Us

Questions, comments and requests regarding this privacy policy are welcomed, you can contact us in the following ways:

- Existing customers can contact us by creating a ticket through their client area.
- Email us at dpo@dc.services (Active Data Protection Officer)
- Call us on 0800 520 2121 or 0203 670 2121
- Or write to us at: DC-SERVICES LTD, Unit 10 Marbridge House, Harlow, Essex, CM19 5BJ

18. Contacting the Regulator

While we will make every attempt to rectify any situation, where you feel your data has not been handled appropriately you have the right to contact the regulator. In this case the regulator is the Information commissioner's office (ICO).

You can contact them on [0303 123 113](tel:0303123113) or by visiting <https://www.ico.org.uk/concerns>