

BREEZE TECHNOLOGY LTD

GENERAL PRIVACY NOTICE

1. PURPOSE OF THIS NOTICE

This notice describes how we collect and use personal data about you/the company in which we have a contract arrangement, in accordance with the General Data Protection Regulation (GDPR), the Data Protection Act (1988 OR 2018) and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK.

Please read the following carefully to understand our processes regarding your personal data and how we will keep it.

2. ABOUT US

Breeze Technology Ltd, “we”, “us”, “our” and “ours”, is an information technology & software design business. Its registered and principal office is located at ESpace South, 26 St Thomas Place, Ely, Cambridge, CB7 4EX.

For the purposes of our data protection policies, the Data Protection legislation, and this notice, we are the ‘data controller’. This means that we are responsible for deciding how we hold and use personal data about you/the company in which we have a contract or ad-hoc business arrangement with. The term “you’ will be used within this document for this. We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice.

Due to the size of Breeze Technology Ltd, our Data Controller will be the point of contact for both DPA and GDPR related questions and/or requests. Should you wish to contact our Data Controller you can do so using the contact details of datacontroller@breeze-technology.co.uk.

3. HOW WE MAY COLLECT YOUR PERSONAL DATA

We obtain personal data about you, for example, when:

- You request a quote or proposal from us in respect of the services we provide.
- You or the Company engages us to provide our services and, also during the provision of those services.
- You or the Company contact us by email, telephone, post or our website (for example when you have a query about our services).

4. THE KIND OF INFORMATION WE HOLD ABOUT YOU

The information we hold about you may include the following:

- Your/the Company personal details (such as name and/or address, telephone number, email address)
- Details of contact we have had with you in relation to the provision, or proposed provision of our services.
- Details of any services you have received from us.
- Our correspondence and communications with you.
- Information about any complaints and enquiries you make to us.

5. HOW WE USE PERSONAL DATA WE HOLD ABOUT YOU

We may process your personal data for purposes necessary for the performance of our contract with you/the Company and to comply with our legal obligations.

We may process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, business development, statistical and management purposes. Where your consent is required for the processing of your personal data then you have the right to withdraw your consent to processing for such specific purposes.

Situations in which we will/may use your personal data

We may use your personal data to:

- Carry out our obligations arising from any agreements entered between you/the Company and us (which will most likely be for the provision of our services).
- Carry out our obligations arising from any agreements entered between our customers and us (which will most usually be for the provision of our services) where you may be a subcontractor, supplier or customer of our customer.
- Provide you with information related to our services that you request from us or which we feel may interest you, provided you have consented to be contacted for such purposes.
- Seek your thoughts and opinions on the services we provide.
- Notify you about any changes to our services.

If you refuse to provide us with certain information when requested, and/or consent, we may not be able to perform the contract or business arrangement we have with you/the Company.

We may also process your personal data without your knowledge or consent, in accordance with this notice, where we are legally required or permitted to do so (for example, a court order requesting specific data/information).

Data Retention

We will only retain your personal data for as long as it is necessary to fulfil the purposes for which it is collected.

When assessing what retention period is appropriate for your personal data, we take into consideration:

- The requirements of our business and the services provided.
- Any statutory or legal obligations.
- The purposes for which we originally collected the personal data.
- The lawful grounds on which we based our processing.
- The types of personal data we have collected.
- The amount and categories of your personal data.
- Whether the purposes of processing could reasonably be fulfilled by other means.
- Whether a valid contract arrangement for the provision of our services remains current.

Change of purpose

Where we need to use your personal data for another reason, other than for the purpose for which we collected it, we will only use your personal data where that reason is compatible with the original purpose.

Should it be necessary to use your personal data for a new purpose, we will notify you and communicate the legal basis which allows us to do so before starting any new processing.

6. DATA SHARING

Why might you share my personal data with third parties?

We will share your personal data with third parties where we are required by law, where it is necessary to administer the relationship between us or where we have another legitimate interest in doing so.

Which third party service providers do you share or processes my personal data?

“Third parties” include third-party service providers and other entities that are necessary in the provision of the services you/the Company have engaged us in. This could include your/the Company’s IT support provider, Anti-virus, Anti-Spam, Cloud services (email, backup, etc).

All our third-party services providers are required to take commercially reasonable and appropriate security measures to protect your personal data. We only permit any of our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal data with other third-parties, for example in the context of a support related issue that will require involving a third-party in order to resolve the issue; your/the Company’s outsourced IT support provider.

7. TRANSFERRING PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)

Personal information in the EEA (which means all the EU countries plus Norway, Iceland and Liechtenstein) (“EEA”) is protected by data protection laws but other countries do not necessarily protect your personal information in the same way.

We may use service providers based outside of the EEA to help us provide our services to you and this means that we may transfer your information to service providers outside the EEA for this purpose. For example, we utilize services such as Office 365, Everycloud, cloud back up services and parts of these services may for example be hosted on servers located within the United States or managed and supported from outside the EEA, to for example, ensure service availability and security is maintained around the clock.

We take steps to ensure that where your information is transferred outside of the EEA by our service providers and hosting providers, appropriate measures and controls are in place to protect that information in accordance with applicable data protection laws and regulations. This may be that there is an adequacy decision by the European Commission in relation to these countries and therefore they will be deemed to provide an adequate level of protection for your personal information. In each case, such transfers are made in accordance with the requirements of the Regulations (EU) 2016/679 (the General Data Protection Regulations or “GDPR”) and may be based on the use of the European Commission’s standard model clauses for transfers of personal data outside the EEA.

By using our website, products or services or by interacting with us in ways described in this notice, you consent to the transfer of your information outside the EEA in the circumstances set out in this notice where it is necessary for the delivery of our services. If you do not want your information to be transferred outside the EEA, you may not be able to use some or all our services.

8. DATA SECURITY

We have put in place commercially reasonable and appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees 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 data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

9. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us, using the contact address of datacontroller@breeze-technology.co.uk.

Your rights in connection with personal data

Under circumstances, by law, you have the right to:

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
- Request correction of the personal data that we hold about you.
- 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 exercised your right to object to processing (see below).
- 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 basis. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.

If you wish to exercise any of the above rights, please email datacontroller@breeze-technology.co.uk.

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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

10. RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided consent to the collection, processing and transfer of your personal data for a specific purpose (for example in relation to direct marketing that you have indicated you would like to receive from us), you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please email datacontroller@breeze-technology.co.uk.

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

11. CHANGES TO THIS NOTICE

We may make changes to this General Privacy Notice from time to time. Any changes we may make to this in the future will be provided to you being updated on our website www.breeze-technology.co.uk, which will always contain our latest version.

This privacy notice was last updated on 13 May 2018

END