# **IT Ninjas Ltd Privacy Policy**

## PRIVACY NOTICE

### Introduction

This document refers to personal data, this is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already classed as being in the public domain.

This document covers The Data Protection Act (DPA), Privacy and Electronic Communications Regulations (PECR) and The General Data Protection Regulations (GDPR) which seek to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU.

IT Ninjas Ltd abides by these regulations as standard. Our processes meet FCA, Bacs, PCIDSS compliance.

#### Who we are

IT Ninjas Ltd. We are a solutions provider in the IT Sector.

#### Personal Data

IT Ninjas uses the information collected from you to provide quotations, make telephone contact and to email you, in connection with public relations, support and marketing information which the company believes may be of interest to you and your business. In you making initial contact you consent to IT Ninjas maintaining dialogue with you until you either opt-out (which you can do at any stage). All data subject information is held with in IT Ninjas Ltd only. We do not share, sell pass on to any other third party. Unless authorised to do so and solely in a contractual business 2 business obligation. When working exclusively as a data processor, IT Ninjas Ltd will be acting on the instruction of its client, and will work hard to ensure that the client is fully GDPR compliant during the process.

Some personal data may be collected about you from the forms and surveys you complete. From records of our correspondence and phone calls, onsite visits and details of your visits to our website, including but not limited to identifying data subjects information to Internet Protocol (IP) addresses. IT Ninjas Ltd may from time to time use such information to identify its visitors. IT Ninjas Ltd may also collect statistics about the behaviour of visitors to its website.

IT Ninjas Ltd website uses cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. IT Ninjas Ltd website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using IT Ninjas Ltd website.

Any information IT Ninjas Ltd holds about you and your business encompasses all the details we hold about you and any sales transactions including any third-party information we have obtain about you from public sources and our own suppliers such as credit referencing agencies.

IT Ninjas Ltd will only collect the information needed so that it can provide you with IT related services and contractual

obligations. IT Ninjas Ltd does not sell or broker your data, although we may pass on your data due to obligational

contracts. le software or hardware vendor to meet contractual registration obligations. If this happens the data subject would be fully informed and the reason for this to complete the contractual obligation.

### Consent

Through agreeing to this privacy notice you are consenting to IT Ninjas Ltd processing your personal data for the purposes outlined. You can withdraw consent at any time by emailing the <a href="mailto:gdpr@itninjas.co.uk">gdpr@itninjas.co.uk</a> see last section for full contact details.

## Disclosure

IT Ninjas Ltd will only pass on data subject information to third parties exclusively to meet a contractual obligation on behalf of your organisation. IT Ninjas Ltd requires all contractual parties to adhere to the minimum requirements in law to protect data subjects. IT Ninjas Ltd do not broker or pass on information gained from your engagement without your consent. However, IT Ninjas Ltd may disclose your personal information to meet legal obligations, regulations or valid governmental request. The agency may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of IT Ninjas Ltd, its clients and/or the wider community.

# Retention Policy

IT Ninjas Ltd will process data subject data during the duration of any contract and will continue to store only the personal data needed for seven years after the contract has expired to meet any legal obligations. After seven years any personal data not needed will be deleted.

# Data storage

Data is held in the United Kingdom using different (multiple) servers. All data is encrypted and controlled access. No data subject information is held outside the UK and or EU. Data that is transitive between countries outside the UK and EU is encrypted. This would be short term only. Example Support staff working outside the EU. Data centres in the UK and EU fail.

## Your rights as a data subject

At any point whilst IT Ninjas Ltd is in possession of or processing your personal data, all data subjects, have the following rights:

- Right of access you have the right to request a copy of the information that we hold about you.
- Right of rectification you have a right to correct data that we hold about you that is inaccurate
  or incomplete.
- Right to be forgotten in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing where certain conditions apply to have a right to restrict the processing.
- Right of portability you have the right to have the data we hold about you transferred to another organisation.
- Right to object you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling you also have the right to be subject to the legal effects of automated processing or profiling.

In the event that IT Ninjas Ltd, refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.

## IT Ninjas Ltd, at your request can confirm what information it holds about you and how

it is processed You can request the following information:

- Identity and the contact details of the person or organisation (IT Ninjas Ltd,) that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of IT Ninjas or a third party such as software and hardware vendor, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (ICO).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any
  meaningful information about the logic involved, as well as the significance and expected
  consequences of such processing.

## To access what Personal data is held, identification will be required

Formal request for disclosure must be supplied by either letter or email to <a href="mailto:gdpr@itninjas.co.uk">gdpr@itninjas.co.uk</a>.

IT Ninjas Ltd will accept the following forms of ID when information on your personal data is requested:

A copy of your driving licence, passport, birth certificate. A minimum of one piece of photographic ID listed above and a supporting document is required. If IT Ninjas Ltd is dissatisfied with the quality, further information may be sought before personal data can be released.

All requests should be made to <a href="mailto:gdpr@itninjas.co.uk">gdpr@itninjas.co.uk</a> or writing to us at the address further below.

# Complaints

In the event that you wish to make a compliant about how your personal data is being processed by IT Ninjas, you have the right to complain to IT Ninjas Ltd directly via letter or email <a href="mailto:gdpr@itninjas.co.uk">gdpr@itninjas.co.uk</a>. If you do not get a response within 30 days you can complain to the ICO.

The details for each of these contacts are:

IT Ninjas Ltd,

Senior Director,

44 Kings Road, Clacton On Sea, Essex, CO15 1BA.

gdpr@itninjas.co.uk

If you are unhappy with the resolution this can be taken to.

ICO

Wycliffe House, Water Lane, Wilmslow, SK9 5AF

Telephone 0303 123 1113 or https://ico.org.uk/global/contact-us/