



Privacy Notice

Secured by Design



UK Police Preferred Specification



TrackaPhone Limited is committed to protecting the privacy and security of your personal information.

Please read this privacy notice carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

When we use your personal data we are regulated under the General Data Protection Regulation (“**GDPR**”) which applies across the European Union (including in the United Kingdom) and we are responsible as ‘controller’ of that personal data for the purposes of the GDPR. Our use of your personal data is subject to your instructions, the GDPR, other relevant UK and EU legislation and our professional duty of confidentiality.

HOW YOUR PERSONAL DATA IS COLLECTED

We will collect most of the above information from you. The circumstances in which we may collect personal data about you include:

- when you or your organisation request a quotation or place an order for our services;
- when you correspond with us by phone, email or other electronic means, or in writing, or when you provide other information directly to us;
- when you or your organisation browse, complete a form or make an enquiry or otherwise interact on our website or other online platforms;
- when you or your organisation offer to provide, or provides, services to us; and
- when you attend any of our marketing events or sign up to receive personal data from us, including training.
- via our website—we use cookies on our website (for more information on cookies, please see our cookies policy at the end of this privacy notice);

HOW AND WHY WE USE YOUR PERSONAL DATA

We may use your personal data only for the following purposes:

- to register you as a customer of TrackaPhone Limited when you place an order for our services;
- to administer our relationship with you, including processing payments, accounting, auditing, billing and taking other steps linked to the performance of our business relationship;
- to protect the security of our communications and other systems and to prevent and detect security threats, frauds or other criminal or malicious activities;



- for any other purposes related and/or ancillary to any of the above or any other purposes for which your personal data was provided to us;
- to communicate with you to keep you up-to-date on the latest developments, announcements, and other information about our, events and initiatives;
- to send you details of client surveys and marketing campaigns where you have opted in; and
- to collect information about your marketing preferences to personalise and improve the quality of our communications with you.

Under data protection law, we can only use your personal data if we have a reason for doing so. We may process your personal data in connection with any of the purposes set out above on one or more of the following legal grounds:

- for the performance of our contract with you or to take steps at your request before entering into a contract;
- to comply with our legal and regulatory obligations;
- because our legitimate interests, or those of a third-party recipient of your personal data, make the processing necessary, provided that those interests are not overridden by your interests or fundamental rights and freedoms;
- where you have given consent

Please note a legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

PROMOTIONAL COMMUNICATIONS

We may use your personal data to send you updates (by email, telephone or post) about changes to our services and products that might be of interest to you.

We have a legitimate interest in processing your personal data for promotional purposes (see above '**How and why we use your personal data**'). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal data with the utmost respect.

You have the right to opt out of receiving promotional communications at any time or to update your marketing preferences by:

- contacting us by e-mailing David Leadbitter or
- using the '**unsubscribe**' link in emails.



We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

WHO WE SHARE YOUR PERSONAL DATA WITH

We may share personal data with:

- other third parties where necessary to supply the goods and services that you have ordered from us;
- the Inland Revenue Service if you are an employee;
- our insurers and brokers;

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

WHERE YOUR PERSONAL DATA IS HELD

Information may be held at our offices, with third party agencies or with service providers as described above.

HOW LONG YOUR PERSONAL DATA WILL BE KEPT

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for. We will keep your personal data after we have completed any orders which we have received from you. We will do so for one of these reasons:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly; and/or
- for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

When it is no longer necessary to retain your personal data, we will delete or anonymise it.

YOUR RIGHTS

You have the following rights, which you can exercise free of charge:



Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
To be forgotten	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data—in certain circumstances e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party
To object	The right to object: — at any time to your personal data being processed for direct marketing; — in certain other situations to our continued processing of your personal data e.g. processing carried out for the purpose of our legitimate interests.

If you would like to exercise any of those rights, please:

- email, call or write to our Data Protection Officer—see below: **‘How to contact us’**; and
- let us have enough information to identify you (e.g. your full name, address and client or matter reference number);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

RIGHT TO WITHDRAW CONSENT



If you have provided your consent to the processing of your personal data, you have the right to withdraw your consent. If you wish to do so, please contact us or “unsubscribe” to any marketing e-mail we send to you, where relevant.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented unless there are compelling legitimate grounds for further processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. Withdrawal of consent to receive marketing communications will not affect the processing of personal data for the provision of our services.

KEEPING YOUR PERSONAL DATA SECURE

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

UPDATING YOUR PERSONAL INFORMATION

We are committed to maintaining the accuracy of the personal data we process. If any of the personal data that you have provided to us changes or if you become aware that we are processing inaccurate personal data about you, please get in touch. We will not be responsible for any losses arising from any inaccurate or incomplete personal data provided to us by you.

HOW TO COMPLAIN

We hope that we can resolve any query or concern you may raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

CHANGES TO THIS PRIVACY NOTICE

This privacy notice was published on 23rd May 2018.

HOW TO CONTACT US



Please contact our Data Protection Officer by post or email if you have any questions about this privacy notice or the information we hold about you.

Our contact details are shown below:

Our Data Protection Officer's contact details

Alan Davidson

TrackaPhone Limited

PO Box 844, Wallsend,

NE28 5BH

By email

alan.davidson@trackaphone.com