

# Privacy Policy

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## 1. Introduction

This privacy policy sets out how tKnowIT Limited processes and protects any personal data that you give tKnowIT Limited when you interact with us, such as through your use of our websites, when you purchase products or services from us or when you request technical support.

tKnowIT Limited is committed to ensuring that your personal data is protected. Should we ask you to provide certain information by which you can be identified then you can be assured that it will only be used in accordance with this privacy policy and in line with the General Data Protection Regulation (GDPR).

tKnowIT Limited may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are aware of any changes.

This version was last updated on 23<sup>rd</sup> May 2018 and historic versions can be obtained by contacting us.

It is important that you read this privacy policy together with any other privacy policy/notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

For clarity, tKnowIT Limited may be both a data controller and data processor for your personal data under certain circumstances.

### Keeping us informed of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## 2. Who we are

tKnowIT Limited is a provider of IT Services, Consultancy and Support. We are based in Norton, Malton, North Yorkshire. The registered office is at 13 Yorkersgate, MALTON, North Yorkshire, YO17 7AA and company number is 04818794. Our main website is <https://www.tknowit.net> and Email: [dataprotection@tknowit.net](mailto:dataprotection@tknowit.net)

We are registered with the Information Commissioner's Office under registration reference: Z8342936

## 3. What we collect

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

**Identity Data:** includes first name, last name, username or similar identifier, title and gender.

**Contact Data:** includes billing address, delivery address, email address and telephone numbers.

**Transaction Data:** includes details about payments to and from you and other details of products and services you have purchased from us.

**Technical Data:** includes internet protocol (IP) address, MAC address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our websites, systems or services.

**QandA Data:** includes records of queries, responses and correspondence in the event that you contact us

**Profile Data:** includes your usernames and passwords, purchases or orders made by you, your interests, preferences, feedback and survey responses.

**Usage Data:** includes information about how you use our websites, Systems, products and services.

**Preference Data:** includes your preferences in receiving marketing from us and our third parties.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation).

Our websites and services are not intended for children and we do not knowingly collect data relating to children.

#### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service but we will notify you if this is the case at the time.

**Financial Data:** we do not hold your financial details on our internal systems. We use GoCardless to facilitate Direct Debit payments from customers and this interacts with our accounts system to reconcile accounts. Please check their privacy notice for more information. <https://gocardless.com/legal/privacy> . For suppliers we will store your bank account details into our bank's e-payment system but not hold these details internally on our systems. <http://www.business.hsbc.com/privacy-policy>

## **4. How we collect your personal data**

We use different methods to collect data from and about you including through:

#### **Direct interactions**

You may give us your Identity, Contact, Preference and Financial Data by filling in forms or by corresponding with us by post, phone, email, helpdesk or otherwise. This includes personal data you provide when you:

- requesting a quote for or purchase products or services from us
- request payment for a products or services we have purchased from you
- subscribe to a service from us or our partners
- request technical support, advice or consultancy
- request marketing, product or service information to be sent to you
- enter a competition, promotion or survey
- give us some feedback.

#### **Automated technologies or interactions**

As you interact with our websites or services, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar

technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.

### **Third parties or publicly available sources**

We may receive personal data about you from various third parties and public sources as set out below:

- Third Parties who have engaged us to provide services (e.g. your employer asked us to provide IT Support or Consultancy services)
- Third Party Providers including Search Engines (e.g. Google)
- Social Media (e.g. Twitter, Facebook, LinkedIn)
- advertising networks and marketing companies
- vendor partners and reseller partners
- credit reference, fraud prevention or government agencies
- providers of technical, payment and delivery services
- publicly available sources such as Companies House and the Electoral Register

If you provide us with personal data about a third party (e.g. when registering a domain name on their behalf), you warrant that you have obtained the express consent from the third party for the disclosure and use of their personal data.

Please be aware that any video, image or other content posted, uploaded or otherwise made available by you on your website is not subject to our Privacy Policy. We merely process such data on your behalf, subject to our Terms and Conditions and you are responsible for any applicable legal requirements in respect of the content.

### **Third-party links**

Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our websites, we encourage you to read the privacy notice of every website you visit.

## **5. What we do with your personal data**

We will only use your personal data when the law allows us to. We use the following as the lawful basis for processing your data:

- **Consent:** where you consent to it
- **Contract:** where we need to perform the contract we are about to enter into or have entered into with you
- **Legitimate Interests:** where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- **Legal Obligation:** where we need to comply with a legal or regulatory obligation

### **Purposes for which we will use your personal data**

We have set out below a list of ways that we may use your personal data, and which of the legal basis we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Processing Purpose	Type of data	Legal basis for processing including basis for legitimate interest
To register you as a new customer	Identity, Contact	Performance of a contract with you
To process and deliver your order for goods and services including: (a) Invoicing (b) Manage payments	Identity, Contact, Financial, Transaction, Preference	Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms (b) Asking you to leave a review or take a survey (c) To respond to refund requests and complaints	Identity, Contact, Profile, Preference	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated, to study how customers use our products/services and to respond to you)
To enable you to partake in a prize draw, competition or complete a survey	Identity, Contact, Profile, Usage, Preference	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity, Contact, Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and other illegal activities and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Identity, Contact, Profile, Usage, Preference, Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Technical, Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations (by telephone, email, social media messages and post), to you about goods or services that may be of interest to you	Identity, Contact, Technical, Usage, Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
Third party direct marketing communications, for example, from our vendor partners	Identity, Contact, Profile, Usage, Preference	With your consent, we may supply your personal data to a third party for their direct marketing purposes
If we discover any criminal activity or alleged criminal activity through fraud monitoring and suspicious transaction monitoring.	Identity, Contact, Technical, Usage, Profile, Financial	Necessary for our legitimate interests (for the purposes of preventing or detecting unlawful acts)
To send you communications required by law or which are necessary to inform you about our changes to the services, products and events we provide to you.	Identity, Contact, Preference, Usage, Profile	(a) Necessary for our legitimate interests (for example, product recall notices, and legally required information relating to your orders) (b) Necessary to comply with a legal obligation
To comply with our contractual or legal obligations to share data with credit reference, fraud prevention agencies and law enforcement agencies.	Identity, Contact, Technical, Financial	(a) Necessary to comply with a legal obligation. (b) Necessary for our legitimate interests (to protect our business by preventing financial crime)
Monitor and record your telephone caller ID, emails and text messages, social media messages and other communications in relation to your dealings with us	Identity, Contact, Technical, Usage, Profile, Financial	(a) Necessary for our legitimate interests (to protect the security of our communications systems and procedures, to check for obscene or profane content, to assess the quality of our customer services and to provide staff training) (b) (a) Necessary for our legitimate interests (to improve the efficiency and performance of service delivery)

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

### **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any company outside tKnowIT Limited for marketing purposes.

### **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

### **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our websites may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy for further details.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **6. Who we may share your personal data with**

We may have to share your personal data with the parties set out below for the purposes set out in the table in section 5 (above).

External Third Parties:

- Service providers acting as processors who provide IT and system administration services, delivery couriers, marketing agencies, credit reference and for fraud management
- Professional advisers acting as processors or joint controllers including lawyers, bankers, accountants, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services
- HM Revenue & Customs, regulators and other authorities and law enforcement bodies
- Vendor partners and reseller partners.

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 7. Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access, disclosure, alteration or loss we have put in place appropriate physical, electronic and managerial procedures to safeguard and secure your personal data.

This includes limiting access to your personal data to those employees, agents, contractors 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 personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please be aware that the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, using SSL Certificates on our website for example, we cannot guarantee the security of your data transmitted to us. Any transmission is at your own risk. We use Transport Layer Security (TLS) to encrypt and protect email traffic. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.

## 8. Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including 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.

## 9. Controlling your personal data (your legal rights)

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

### You have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- 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 successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- 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 ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

### No fee usually required

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 is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to



access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

#### **Contact details**

Should you have any questions please contact us as follows:

- In writing to:  
tKnowIT Limited  
4 Beck Mill Close, Norton,  
MALTON, North Yorkshire,  
YO17 9PD
- emailing us at [dataprotection@tknowit.net](mailto:dataprotection@tknowit.net)
- Telephone 01653 908069

If you believe that any information we are holding on you is incorrect or incomplete, please telephone, write to or email us as soon as possible. We will promptly correct any information found to be incorrect.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (<https://www.ico.org.uk/concerns>).

- Information Commissioner's Office  
Wycliffe House, Water Lane,  
Wilmslow, Cheshire  
SK9 5AF
- Tel: 0303 123 1113

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.