

Issue No	4
Issue Date	02/05/2024
Last Reviewed	02/05/2024
Confidentiality	Public
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Document History:

Issue	Page No(s)	Date	Brief details of amendment(s) to procedure
1	All	18/12/2019	First issue of Data Privacy Policy
2	All	23/03/2022	Amended to include document history and header
3	All	27/03/2023	Revised content in compliance with the Data Protection Act 2018
4	All	02/05/2024	Minor update to policy terminology for 'Privacy Notice'

1. Introduction

Storetec Services Limited (referred to as “Storetec”, “we”, “us”, or “our”) is committed to ensuring your privacy is protected with regard to the way we collect and use your personal data. We recommend you read this privacy notice carefully to understand your privacy rights under the Data Protection Act 2018 (DPA 2018) and to understand our aims, views, and practices in regard to how we treat your personal data, and the controls we implement to protect your personal data when you visit our website (www.storetec.net).

2. Purpose

The Privacy Notice describes the policies of Storetec Services Limited, Sidings Business Park, Freightliner Road, Hull, East Yorkshire HU3 4XA, United Kingdom of Great Britain and Northern Ireland (the), email: sales@storetec.net, phone: 01482 608630 on the collection, use and disclosure of your information that we collect when you use our website (www.storetec.net). (the “Service”). By accessing or using the Service, you are consenting to the collection, use and disclosure of your information in accordance with this Privacy Notice. If you do not consent to the same, please do not access or use the Service.

3. Identity of the Controller and Processor

For the purpose of the Data Protection Act 2018 (DPA 2018) and UK General Data Protection Regulation (UK GDPR), the Data Processor is Storetec Services Ltd, Sidings Business Park, Freightliner Road, Hull, HU3 4XA.

4. Individuals whose data we collect and process

4.1 We collect and process data from a range of individuals:

- 4.1.1 visitors to our website at Storetec.net;
- 4.1.2 individuals who are authorised by ourselves and our customers to use our software and services on their behalf (Authorised Users);
- 4.1.3 individuals who are end users of our customer's services (end users). Our customers use our software and services to create personal profiles of those individuals who visit their website or their physical premises;
- 4.1.4 individuals with "legitimate interest" found within database supplying websites.

You will fall into one or more of one of these categories of individuals.

5. Types of Personal Data

5.1 We may collect and process the following data about individuals:

- 5.1.1 Information that you provide by filling in forms on our site, which includes information provided at the time of registering to use our site, subscribing to our services or requesting further services or information. For example:
- 5.1.2 Information about your site activities, such as the pages you visit. We do this by using "cookies", which are small files stored on your local device to keep track of information about your visit to the website and your activity. For more information about how we use cookies, please refer to our Cookie Policy.
- 5.1.3 If you contact us via our 'live chat' feature or by email, we may keep a record of any information you provide along with any associated correspondence we receive, which would include your message content, email address, contact name and contact number.
- 5.1.4 Details of your visits to our site including, but not limited to, traffic data, location data, weblogs and other communication data and the resources that you access;

6. Purpose and Legal Basis for Processing

The lawful bases for processing your personal data are set out in Article 6 of the UK GDPR. We have outlined each of the applicable legitimate bases for processing and provided information about the type of data we collect and the purposes for which we use it, as follows:

6.1 **Legitimate Interest:** when we process personal data for legitimate business purposes, such as helping us research how customers use our services and maintain customer relationships, as well as to understand more about our target audience (such as the location of our site visitors) to meet business goals. On this basis, we may collect:

6.1.1 **Contact information**, such as name, company name, email address, and contact number

We use this information:

- (a) to provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- (b) to ask you to complete surveys or questionnaires to help us understand more about your views on our products or services and how we can improve

6.1.2 **Web activity**, we use “cookies”, which is a type of technology that helps us to improve our site and to deliver a better and more personalised service for our users. Information collected includes IP address where available, operating system and browser type.

We use this information:

- (a) to ensure that content from our Storetec Services Ltd is presented in the most effective manner for you
- (b) to help us to improve our site and to deliver a better and more personalised service for users and our customers
- (c) to tailor the relevant content on our website based on visitor interest
- (d) to measure the effectiveness of the information and products we decide to display on our site
- (e) to understand visitor numbers
- (f) to store information about a user's preferences, so we can customise our site according to a public interest and offer goods or services in which we believe they will be interested;

- (g) to speed up your searches
- (h) to recognise you when you return to our site.

To find out more about cookies, including the function of each individual cookie we use, please see our Cookie Policy. If you want to find out more about cookies and how to disable them, we recommend our users to visit <http://www.allaboutcookies.org> for more information.

6.2 **Contract Performance:** when we need to process the data to carry out our obligations arising from any contracts entered into by you and us. On this basis, we may collect:

6.2.1 **Contact information**, such as name, company name, email address, and contact number

We will use this information:

- (a) to register you as a new customer or sales contact after you make an enquiry
- (b) when you complete a survey to help us understand your views on our products and services
- (c) notify you of any changes to our service terms or privacy notice

6.2.2 **Transaction information** and data associated with financial transactions, such as payee name, billing address, and amount billed

We use this information:

- (a) to process and deliver any orders you place with us
- (b) in order to manage payments and charges when you enter into a contract with us

6.3 **Compliance with Applicable Laws:** when we need to process personal data in order to cooperate with any legally binding request for the disclosure of the Data by a law enforcement authority unless otherwise prohibited, such as a prohibition under criminal law to preserve the confidentiality of a law enforcement investigation.

7. Sharing your data

7.1 The data we collect will not be transferred to, stored at, or shared with anyone outside of our business, this includes to any third party in the UK or internationally. However, your data may be disclosed to third parties in a limited number of cases, where any of the following conditions apply:

7.1.1 We sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets

7.1.2 If Storetec Services Ltd or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;

7.1.3 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 and other agreements; or to protect the rights, property, or safety of Storetec Services Ltd, our customers, or others.

7.2 We use Google Analytics and other monitoring software on our site. These types of technologies also allow the proprietor of the technology e.g. Google to also access your information, we have no control over how your information is processed by third parties such as Google. Please read the privacy packages of the provider to understand how your information may be used by these third parties.

8. Retention & Deletion

Storetec Services Limited retains your information while you / your company remains an active client unless you ask us to delete your information. If you stop being an active client, we will retain your information unless you request that your details be deleted; however, we will only contact you if we believe the information we intend to send to you could be of 'legitimate interest' to you or your company.

If you have signed up to receive our newsletter / requested information from us, we will retain your information until you request to be removed / deleted. Subject to the exceptions described below, Storetec Services deletes or anonymizes your information upon request.

Subject to applicable law, Storetec Services may retain information after account deletion:

8.1 If there is an unresolved issue relating to your account, such as an outstanding invoice on your account.

8.2 Storetec Services may also retain certain information if necessary for its legitimate business interests, such as fraud prevention.

- 8.3 If we are required to by applicable law; and/or in aggregated and/or anonymized form.
- 8.4 3rd party services that we use on our site that may set cookies include Google Analytics and others.

9. Where we store individual's personal data

The data that we collect from you will not be transferred to, or stored at, a destination outside the UK. By submitting your personal data, you agree to the storing or processing of data. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

10. How we use your data

10.1 We use the data held about you in the following ways:

- 10.1.1 To ensure that content from our Storetec Services Ltd is presented in the most effective manner for you;
- 10.1.2 To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- 10.1.3 To carry out our obligations arising from any contracts entered into between you and us;
- 10.1.4 To allow you to participate in interactive features of our service, when you choose to do so;
- 10.1.5 To notify you about changes to our service;
- 10.1.6 To generate personal profile reports about you which we use to help to tailor our services, and our interactions with you to suit your preferences.

We do not disclose personal information about individuals to advertisers or sell your information to any other organisation for marketing purposes.

11. Links to other sites

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

12. Accessing your information

12.1 The UK GDPR gives you the right to access information held about you. You can find out if we hold any personal information about you by making a "data subject access request" under UK GDPR. If we do hold information about you, we will:

- 12.1.1 Give you a description of it;
- 12.1.2 Tell you why we are holding it;
- 12.1.3 Tell you who it could be disclosed to; and
- 12.1.4 Let you have a copy

Any formal subject access request should be made in writing to the address below (see section 14). This will be provided free of charge. However, we may charge a reasonable fee for repetitive, unfounded, or excessive requests or additional copies.

13. Data Subject Rights

13.1 Right to Be Informed – the right to be informed about the use of your personal data, your privacy and rights under all relevant privacy laws and regulations, for example, by being given access to a privacy notice such as this one.

13.2 Right of Access – the right to obtain a copy of your personal data, as well as any relevant supplementary information in order to help you understand how and why your data is being used, and to check it is being used lawfully.

13.3 Right to Rectification – the right to request the Controller to rectify inaccurate or incomplete personal data.

13.4 Right to Erasure – the right to have the controller erase personal data without undue delay. Contingent on the occurrence of one of the following:

- 13.4.1 The data is no longer necessary;
- 13.4.2 The data subject withdraws consent (and consent is the legal basis for processing);
- 13.4.3 Controller has no overriding grounds for continuing processing against the objectification;
- 13.4.4 Processing was unlawful;
- 13.4.5 Erasure is necessary with UK or international law.

13.5 Right to Restrict Processing – the right to have the Controller restrict processing if:

- 13.5.1 The accuracy of the data is contested;

- 13.5.2 Processing is unlawful
 - 13.5.3 The controller no longer needs the data for its original purpose, but needs it for legal purposes;
 - 13.5.4 Erasure is pending
- 13.6 Right of Data Portability – the right to receive a copy of your data in a commonly used machine-readable format for transfer to another controller. This will either be in .xls or .csv format.
- 13.7 Right to Object - the right to object to processing based on either public interests or legitimate interests. Processing must stop unless the controller demonstrates compelling grounds for continuing the processing or that the processing is necessary in connection with the controller's legal rights.
- 13.8 Rights in Relation to Automated Decision Making and Profiling – the right to object to, or reject any decisions which concern or affect you, if they are based solely on automated processing or automated decision making.

14. Changes to our Privacy Notice

This notice will be kept under regular review on an annual basis. Updates to this notice will be updated on our website and the document history will reflect the issue number and nature of any changes following a new revision of the notice.

Storetec reserves the right to make changes to our privacy notice without prior consultation being undertaken, though we recommend that our interested parties, data subjects and concerned individuals check this page for updates regularly to ensure you are informed of any changes to how we handle personal data in accordance with the purposes set out in clause 6.

15. Contact

We welcome and encourage an individual's right to submit enquiries to us, as well as complaints, feedback and requests (including Subject Access Requests) in regard to the handling of your personal data. If you wish to make any sort of enquiry, you can contact us through our appointed Data Protection Officer using the details below.

The Data Protection Officer
Storetec Services Limited
Sidings Business Park
Freightliner Road
Hull
East Yorkshire
HU3 4XA

Or via email to compliance@storetec.net.

You also have the right to make a complaint at any time to a supervisory authority, such as to the Information Commissioner's Office (ICO), who are an independent body designed to uphold information rights in the UK in accordance with the UK GDPR. For more information about the ICO, please visit www.ico.org.uk.