

# GDPR Policy & Privacy Notice

## Introduction

The Data Protection Act 2018 (or superseding Acts) describes how organisations – including Senseco, must collect, handle and store personal data.

This policy sets out how Senseco collects, handles and stores your personal data received through the use of our site SensecoSystems.com, dealing with us through contractual engagement or any information you provide through our website when you purchase a product or service or sign up to our newsletter.

By providing us with your data, you warrant to us that you are over 16 years of age. Senseco Systems Limited is the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this document).

## Why This Policy Exists

This policy ensures that Senseco:

- Complies with data protection law and follows good practice
- Protects the rights of staff, customers and partners
- Is open about how it stores and processes individual’s data
- Protects itself from the risk of data breach

## Contact Details

Appointed Data Protection Officer: **Emma Manuel**  
Email address: [GDPR@sensecosystems.com](mailto:GDPR@sensecosystems.com)  
Postal address: **6 Ambley Green, Gillingham Business Park  
Kent, ME8 0NJ**  
Tel: **0845 644 2888**

If you are not happy with any aspect of how we collect or use your data, you have the right to complain to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk))

We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you. It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at [GDPR@sensecosystems.com](mailto:GDPR@sensecosystems.com)

SSD228V2



Company Registration No: 6840964

## What Data Do We Collect About You?

Personal data means any information capable of identifying an individual. It does not include anonymised data. We may process certain types of personal data about you as follows:

- Identity data may include your first name, last name, title and gender
- Contact data may include your billing address, delivery address, email address and telephone numbers
- Financial data may include your bank account details
- Transaction data may include details about your payments between us and other details of purchases made by you.
- Technical data may include your login data, internet protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other
- Technology on devices you use to access this site
- Usage Data may include information about how you use our website, products and services

### Sensitive Data

We do not collect any sensitive data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

## How We Collect your Personal Data

We collect data about you through a variety of different methods including:

- Direct interactions: You may provide data by filling in forms on our site (or otherwise) or by communicating with us by post, phone, email or otherwise, including when you:
  - order our products or services
  - subscribe to our service
  - request resources be sent to you
  - give us feedback
- Automated technologies or interactions: As you use our site, we may automatically collect Technical Data about your equipment, browsing actions and usage patterns. We collect this data by using cookies, server logs and similar technologies. We may also receive Technical Data about you if you visit other websites that use our cookies.
- Third parties or publicly available sources: We may receive personal data about you from various third parties and public sources as set out below
- analytics providers such as Google
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register

## How We Use Your Personal Data

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where we need to perform the contract between us
- 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
- Where we need to comply with a legal or regulatory obligation

Purposes for processing your personal data Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data.

Please email us at [GDPR@sensecosystems.com](mailto:GDPR@sensecosystems.com) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of Data	Lawful Basis for Processing
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to recover debts owed to us
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(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 and to study how customers use our products/services
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, and to develop our business
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests to develop our products/services and grow our business

### Change of Purpose

We 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 find out more about how the processing for the new purpose is compatible with the original purpose, please email us at [GDPR@sensecosystems.com](mailto:GDPR@sensecosystems.com)

Should we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground for processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

## **Disclosures of Your Personal Data**

We may have to share your personal data with the parties set out below for the purposes set out in the table above:

- Service providers who provide IT and system administration services
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances
- Third parties to whom we sell, transfer, or merge parts of our business or our assets

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

## **Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instruction, 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.

## **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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

You can see more about these rights at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at [GDPR@sensecosystems.com](mailto:GDPR@sensecosystems.com). 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.

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. 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.

## Third Party Links

The company website, [www.sensecosystems.com](http://www.sensecosystems.com) 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 website, we encourage you to read the privacy notice of every website you visit.