

dell factor ltd

23rd May 2018

1 Privacy Policy

This is the privacy policy of dell factor ltd (UK Company Registration No: 2705875).

Our registered office is at:

Merrills Hall Lane
Wednefield
Wolverhampton
WV11 3QW

In this document, "we", "our", or "us" refer to dell factor ltd.

2 Introduction

This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.

We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website, and all commercial and private individuals we have trading relations with, are entitled to know that their personal data will not be used for any purpose unintended by them and will not accidentally fall into the hands of a third party.

We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.

Our policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).

The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. We do this now, by requesting that you read the information provided at www.knowyourprivacyrights.org

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected.

3 The bases on which we process information about you

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant, then we shall immediately stop processing your data.

If the basis changes then if required by law, we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

4 Information we process because we have a contractual obligation with you

When you buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- verify your identity for security purposes
- provide products to you
- provide you with our services
- provide you with suggestions and advice on products, services and how to obtain the most from using our website

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract. Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to a particular service we provide. If we use it for this purpose, you as an individual will not be personally identifiable. We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

5 Staff guidelines for processing information under a contractual obligation

The only people able to access data covered by this policy will be those who need it for their work.

Data will not be shared informally. When access to confidential information is required, employees can request it from their line managers.

dell factor ltd provides training to all employees to help them understand their responsibilities when handling data.

Employees will keep all data secure, by taking sensible precautions and following the internal guidelines below.

Personal data will not be disclosed to unauthorised people, either within the company or externally.

Data will be regularly reviewed and updated if it is found to be out of date. If no longer required, it will be deleted and disposed of.

Employees will request help from their line manager or the data protection officer if they are unsure about any aspect of data protection.

5.1 Data Storage

These rules describe how and where data should be safely stored.

When data is stored on paper, it will be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

When not required, the paper or files will be kept in a locked drawer or filing cabinet.

Employees will make sure paper and printouts are not left where unauthorised people could see them, like on a printer.

Data printouts will be shredded and disposed of securely when no longer required.

When data is stored electronically, it will be protected from unauthorised access, accidental deletion and malicious hacking attempts:

If data is stored on removable media (like a CD or DVD), these will be kept locked away securely when not being used.

Data will only be stored on designated drives and servers and will only be uploaded to an approved cloud storage service.

Servers containing personal data will be sited in a secure location, away from general office space.

All servers and computers containing data will be protected by approved security software and a firewall.

5.2 Data Use

Personal data and company data is of no value to dell factor ltd unless the business requires it for the purpose of carrying out its contracted services.

Data will not be shared informally.

Data will never be transferred outside of the European Economic Area unless required by global support operations involved in the provision of contracted services, such as software support and third party service providers such as *mailchimp* who are based in the USA.

6 Information we process with your consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including job opportunities and our products and services, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, we might ask you to agree to our use of cookies.

Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our website.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent, or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us at register@dellfactor.com. However, if you do so, you may not be able to use our website or our services further.

7 Information we process for the purposes of legitimate interests

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

- record-keeping for the proper and necessary administration of our business.
- responding to unsolicited communication from you to which we believe you would expect a response
- protecting and asserting the legal rights of any party
- insuring against or obtaining professional advice that is required to manage business risk
- protecting your interests where we believe we have a duty to do so

8 Information we process because we have a legal obligation

We are subject to the law like everyone else. Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal information.

9 Information we process due to a medical situation

Should you be a dell factor ltd employee, or on dell factor ltd premises or attending one of our events and become unwell, we will process your information under a duty of care.

10 Specific uses of information you provide to us

10.1 Job application and employment

If you send us information in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for ten years before destroying or deleting it.

10.2 Sending a message to us.

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our business.

We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

10.3 Complaints

When we receive a complaint, we record all the information you have given to us.

We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

11 Disclosure and sharing of your information

11.1 Information we obtain from third parties

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

11.2 Third party advertising on our website

Third parties may advertise on our website. In doing so, those parties, their agents or other companies working for them may use technology that automatically collects information about you when their advertisement is displayed on our website.

They may also use other technology such as cookies or JavaScript to personalise the content of, and to measure the performance of their adverts.

We do not have control over these technologies or the data that these parties obtain.

Accordingly, this privacy notice does not cover the information practices of these third parties.

11.3 Credit reference

To assist in combating fraud, we may share information with credit reference agencies, so far as it relates to clients or customers who instruct their credit card issuer to cancel payment to us without having first provided an acceptable reason to us and given us the opportunity to refund their money.

11.4 Data may be processed outside the European Union

Our websites are hosted in the United Kingdom.

We may also use outsourced services in countries outside the European Union from time to time in other aspects of our business.

Accordingly, data obtained within the UK or any other country could be processed outside the European Union.

For example, some of the software our website uses may have been developed in the United States of America or in Australia, and third party service providers such as mailchimp are based in the USA.

We use the following safeguards with respect to data transferred outside the European Union:

- the processor is within the same corporate group as our business or organisation and abides by the same binding corporate rules regarding data processing.
- we comply with a code of conduct approved by a supervisory authority in the European Union.

12 Access to your own information

12.1 Access to your personal information

At any time you may review or update personally identifiable information that we hold about you, by signing in to your account on our website.

To obtain a copy of any information that is not provided on our website you may send us a request at register@dellfactor.com

After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

12.2 Removal of your information

If you wish us to remove personally identifiable information from our website, you may contact us at register@dellfactor.com

This may limit the service we can provide to you.

12.3 Verification of your information

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information

13 Other matters

13.1 How you can complain

If you are not happy with our privacy policy or if you have any complaint, then you should tell us by email. Our address is register@dellfactor.com

If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns/>

- to provide you with the services you have requested;
- to comply with other law, including for the period demanded by our tax authorities;
- to support a claim or defence in court.

13.2 Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

13.3 Compliance with the law

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, please contact us.

However, ultimately it is your choice as to whether you wish to use our website.

13.4 Review of this privacy policy

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us.