Client Personal Data Privacy Policy

1 What is the purpose of this document?

COMM-TECH is committed to protecting the privacy and security of your personal information. “Your personal information” refers to information regarding yourself, your staff or contractors, the nature of which is listed in section 3 of this document.

This privacy notice describes how we collect and use your personal information during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR). It applies to all our clients and those to whom we provide IT Services.

COMM-TECH is a "data controller". This means that we are responsible for deciding how we hold and use your personal information. We are required under data protection legislation to notify you of the information contained in this privacy notice. We may update this notice at any time. It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing your personal information, so that you are aware of how and why we are using such information.

2 Data protection principles

We will comply with data protection law. This says that your personal information must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.

3 The kind of information we hold about your users

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, store, and use the following of your personal information:

• Full name
• Email address (both in their role within your organisation and personal email addresses).
• Office phone number and occasionally mobile and/or home phone number
4 How is this personal information collected?

We collect personal information about individuals working with our clients in the process of fulfilling our contract with your organisation and it’s representatives (i.e. providing technical support).

5 How we will use this personal information

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to contact persons in order to fulfil the contract we have entered into with your organisation.
2. Where we need to comply with a legal obligation.
3. 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.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

Situations in which we will use this personal information

We need to record the types of information list in section 3 above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process this personal information are listed below.

- Determining whether the individuals concerned are authorised to use your systems
- Administering the contract we have entered into with your organisation.
- Contacting the individuals with regards to IT support issues.
- To prevent fraud.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

6 Change of purpose

We will only use your personal information 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 we need to use your personal information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7 Data sharing
We may share your personal data with 3rd parties in order to undertake our contractual obligations to our clients. We require third parties to respect the security of your data and to treat it in accordance with the law. We do not envision needing to transfer any personal information outside the EU. If we do, you can expect a similar degree of protection in respect of the personal information concerned.

Why might we share my personal information with third parties?
We will share your personal information with third parties where required by law or where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information and when?
Should one of your service providers require contact information with your staff in order to fulfil their role as a service provider to your organisation.

When might we share your personal information
We will share this personal information with these third-parties in order to facilitate service supplies contracted by your organisation.

Transferring information outside the EU
We will not transfer your personal information outside the EU.

8 Data security
We have put in place measures to protect the security of your personal information. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

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

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

How long will we use your personal information for?

We will only retain personal information 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. Details of retention periods for different aspects of your personal information are available in our data retention policy. 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. In some circumstances we may anonymise your personal information so that it can no longer be associated with an individual, in which case we may use such information without further notice to you. Once an individual is no longer an employee, worker or contractor for your company we will retain and securely destroy your personal information in accordance with our data retention policy.

10 Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

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

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

• Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

• Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

• Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).

• Object to processing of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.

• Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
• Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact privacy@comm-tech.org in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such 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 the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

11 Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact privacy@comm-tech.org. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

12 Data privacy manager

We have appointed a Data Privacy Manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information please contact the DPM. 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.

13 Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.