# **Privacy Policy**

Date: 09/04/2018

# **Summary**

Dartmouth Directory understands the importance of taking good care of your information and ensuring you have maximum control and visibility of it.

If you'd like to access information we have in your name, amend or delete any information please contact us using the details at the bottom of this notice.

IF YOU DO NOT ACCEPT AND AGREE WITH OUR PRIVACY POLICY THEN YOU MUST NOT CORRESPOND FURTHER WITH US, AND ASK TO HAVE YOU DETAILS DELETED.

Dartmouth Directory (DD, "we", "us", and "our") will always uphold high ethical and procedural standards towards your privacy at all times. Information contained in our privacy policy informs you of the way in which your Personal Data (defined underneath) you provide us (or we collect from you) will be used.

When you contact/instruct DD, you agree to our privacy policy and you consent to our collection, storage and use of your Personal Data. This is a contractual basis to enable us to communicate with you and provide you with our services.

If we contact your business via a DD telesales campaign (which we define as legitimate interests), you have the right there and then to request we remove your details from our systems.

For the purpose of Data Protection, any Personal Data you or any of your associates submit to DD, you will be the data controller and we will be a data processor of this material.

## PERSONAL DATA WE MAY OBTAIN FROM YOU

"Personal Data" is information relating to an identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

We may obtain and use the following Personal Data about you:

- Your correspondence details (via emails, written forms, web forms, invoicing and accounting)
- Previous correspondence for comparison and recall purposes (in our email) with you, your colleagues or associates with regards your advertisement with us.

Data and information you or your associates submit to DD might include email addresses, residential addresses, telephone numbers, and email responses.

All data submitted to DD may contain Personal Data although unlikely sensitive personal data. Sensitive Personal Data is defined as data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic or biometric data, data concerning health, data concerning sex life or sexual orientation and data concerning the commission or alleged commission of any offence.

You have the right to offer DD Personal Data and you are solely responsible for obtaining all required consents, authorisations and permissions from any third parties - and providing all required notifications to third parties.

It is your responsibility to ensure that third parties on whose behalf you are submitting data are aware of DD's Privacy Policy. You may not provide DD with the personal data of third parties unless and until you have obtained all necessary consents, authorisations and permissions to do so.

# **BROWSING OUR WEBSITE, COOKIES AND IP ADDRESSES**

We may obtain information about your computer when browsing our website, which includes your IP address, browser type and operating system where available. This data is used to assist system administration only, and help us better understand how our website is used.

#### WHERE WE STORE PERSONAL DATA

The Personal Data we obtain from you will be stored mainly on our secure servers, and in our account package (XERO) which is based in the cloud.

DD may also, among other things, be involved in the processing of payment details (inwards and outward), in the general handling of operating the business.

As the transmission of data via the Internet cannot be assumed completely secure, we cannot guarantee the security of any of your or your associates data transmitted to our systems; you are therefore responsible for any risk associated with such transmission.

#### **HOW WE PROTECT YOUR PERSONAL DATA**

We will take all reasonable steps in mitigation and prevention - to maintain appropriate measures to protect the Personal Data you provide to us against accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to your Personal Data.

#### **HOW WE USE YOUR PERSONAL DATA**

Personal Data we hold about you and your associates may be used in any of the following ways:

- To provide you and your associates with DD's details and matters specific to your dealings with us.
- To provide you and your associates with ongoing communications.
- For research and analytics purposes (for example, to improve the quality of our business). This may include an optional survey.
- To comply with applicable Laws, court orders, government and law enforcement agencies' requests.
- To send you further information about our services for which we think you may have an interest.
- To send you further information based on a request we have received from you. For example, with offering guidance or advice on a fundraising or matters of donations.
- To inform you of any material risk to your operations which we have identifies and see it as
  essential communications. This includes Data Protection information, and other possible
  threats affecting you and us.

## **DISCLOSURE OF YOUR INFORMATION**

Disclosure of your and your associates Personal Data (including, without limitation, client information) to third parties will only occur in any of the following events:

 We are required to disclose your or your Users' personal data in order to fulfil any legal obligation, to protect the property, rights or safety of DD or other parties. In such case, information may be exchanged with third party companies or organisations in order to prevent fraud or reduce credit risk.

## YOUR RIGHTS AND SUBJECT ACCESS REQUESTS

You retain at all times the right to access / amend / delete any Personal Data we hold about you or to exercise your right of data portability or to object to, or restrict, the purposes for which your Personal Data is processed on certain grounds. You may exercise this right by making a request in accordance with Data Protection Laws, by contacting us. You may also lodge a complaint with the UK data protection regulator, the Information Commissioner should you be dissatisfied with the way that we handle your Personal Data.

You undertake to notify your associates of this privacy policy and of their rights under the Data Protection Law. We will provide you with reasonable assistance to enable you to comply and respond to a request, query or complaint from anyone in relation to their personal data.

## HOW LONG WE KEEP PERSONAL DATA FOR

We will keep your and your Users' Personal Data for the duration of your membership of DD and in accordance with your instructions or for such periods as may be required by law.

## **CHANGES TO OUR PRIVACY POLICY**

If at any time we make a change to this policy, we will update this page to reflect such change. We recommend you review this page periodically to ensure you remain happy with the latest version.

## QUESTIONS, COMMENTS AND GETTING IN TOUCH

We welcome any questions or comments in relation to this privacy policy, and advise you contact us on the details below.

CONTACT Michael Freeman - support@dartmouth.org.uk