



PRIVACY POLICY

This privacy policy sets out how Sidey Group of companies uses and protects any information that you give Sidey Group of companies when you use this website. This is inclusive of the data protection Act 1998 and the EU General Data Protection Regulation 2016/679. This means that we are responsible for, and control the processing of, the personal information you provide to us when using our website in accordance with this privacy policy.

We understand that customers and interested parties care about the use and storage of their personal information and we value your trust in allowing us to do this in a careful, sensible and ethical manner. We have updated our privacy policy statement in order to demonstrate our commitment to the privacy of our customers, interested parties, stakeholders inclusive of GDPR 2018.

Sidey Group of companies is committed to ensuring your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website; you can be assured that it will only be used in accordance with this privacy statement.

Sidey Group of companies may change this policy from time to time by updating this policy. You should check this from time to time to ensure you are happy with any changes. This policy is effective and live from (the date as stated on the policy)

By using Sidey group of Companies Website you are acknowledging that we are processing your personal information and, where necessary consenting to such practices, as outlined in this policy.

Other requirements in relation to enquires on recruitment would be covered within our Data policy QA499.

What we Collect

We may collect the following information:

- Name and job title.
- Contact information including email address.
- Demographic information such as postcode, preferences and interests.
- Other information relevant to customer surveys and/or offers.
- Other specific and information.
- **Maintain records indicating your consent to status** – to ensure we accurately reflect your wishes when communicating to you.
- Material used on our website and / or social media.
- Sign up data for our newsletter and other marketing emails.
- Brochure Requests.
- **Website service communication** – provide notifications of any changes to our website or to our services that may affect you (and others if their personal information is provided by you);

What we do with the information we gather

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- Internal record keeping.
- To improve our products and services to you.
- Sending promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.
- We may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail.
- We may use the information to customise the website according to your interests.

How long we will keep your personal information

We retain your information for a range of purposes which determine the period of time for which we need to keep such information.

For example (list is not exclusive):

Data	Retention Period
Recorded telephone conversations	7 days from the day of call received unless otherwise stated
For the purposes of marketing	5+ years from the point of last contact with you, this may include use of our websites, or responses to communications with you unless otherwise stated.
For compliance with legal obligations	For compliance with legal obligations arising from contracts entered into with you, for example UK tax regulations.

Information security

To protect your information, Sidey has in place policies and procedures to make sure that only authorised personnel can access the information, that information is handled and stored in a secure and sensible manner and all systems that can access the information have proportionate and reasonable security measures in place. To achieve this, employees, contractors, sub-contractors and third party suppliers have contracts, with defined roles and responsibilities.

While we take commercially reasonable measures to ensure the safety and security of your data, due to the inherent risks with the Internet, we are unable to warranty the absolute security of your data when using our services so far as reasonable and practicable

Preparing for a personal data breach- Risk assessment

- We know how to recognise a personal data breach.
- We understand that a personal data breach isn't only about loss or theft of personal data.

- We have prepared a response plan for addressing any personal data breaches that occur using additional support systems of risk assessment, systems audits ,etc. We have allocated responsibility for managing breaches to a dedicated person or team.
- Our staff - know how to escalate a security incident to the appropriate person /team in our organisation to determine whether a breach has occurred.

Responding to a personal data breach

- We have a process to assess the likely risk to individuals as a result of a breach.
- We have and staff are aware who the relevant- authourised persons are for our processing activities.
- We have a process to notify the Information Commissioner's Office (ICO) of a breach within 72 hours of becoming aware of it, even if we do not have all the details yet.
- We understand what information we must give the ICO about a breach.
- We have a process to inform affected individuals about a breach when it is likely to result in a high risk to their rights and freedoms.
- We know that we must inform affected individuals without undue delay.
- We know what information about a breach we must provide to individuals and that we should provide advice to help them protect themselves from its effects.
- We will document all breaches, even if they don't all need to be reported.

Information relating to a breach - notification to the supervisory authority that must be detailed and communicated

When reporting a breach, provision must be made of the following:

- A description of the nature of the personal data breach including, where possible:
 - The categories and approximate number of individuals concerned
 - The categories and approximate number of personal data records concerned.
 - The name and contact details of our data protection officer or other contact point where more information can be obtained.
 - A description of the likely consequences of the personal data breach.
 - A description of the measures taken, or proposed to be taken, to deal with the personal data breach, including, where appropriate, the measures taken to mitigate any possible adverse effects.

Information must we provide to individuals when telling them about a breach

We will describe, in clear and plain language, the nature of the personal data breach and, at least:

- The name and contact details of our data protection officer or other contact point where more information can be obtained.
- A description of the likely consequences of the personal data breach.
- A description of the measures taken, or proposed to be taken, to deal with the personal data breach and including, where appropriate, of the measures taken to mitigate any possible adverse effects.

Transfers of your information out of the EEA (European Economic Area)

We do not envisage any sharing of your personal data outside the UK or our business however, if transfer does occur your data will be subject to adequate levels of protection that

will safeguard your privacy rights and give you remedies in the unlikely event of a security breach.

Your Rights

In order to process any of the requests listed below, we may need to verify your identity for your security and our legal compliance requirements. In such cases your response will be necessary for you to exercise this right.

The right to access information we hold about you

At any point you can contact us to request details concerning the information we hold about you, why we have that information, who has access to the information and where we got the information. In most cases you may be entitled to copies of the information we hold concerning you. Once we have received your request we will respond within 30 calendar days.

The right to correct and update the information we hold about you

If the data we hold about you is out of date, incomplete or incorrect, you can inform us and we will ensure that it is updated.

The right to have your information erased

If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request, we will confirm whether the data has been deleted or tell you the reason why it cannot be deleted.

The right to object to processing of your data

You have the right to request that we stop using your data. Upon receiving the request, we will contact you to tell you if we are able to comply or if we have legitimate grounds to continue. If data is no longer processed, we may continue to hold your data to comply with your other rights.

The right to data portability

You have the right to request that we transfer your data to another controller. Once we have received your request, we will comply where it is feasible to do so.

The right to object to any automated decision making / profiling

You have the right to request that businesses stop profiling you in relation to any direct marketing practice. You can inform the persons- businesses undertaking this and they must deal with your request accordingly.

Right to complain

You have the right to complain if you feel your data is not being used correctly through admin@sidey.co.uk requesting the email address for our nominated data controller or to the data protection supervisory authority – in the UK - Information Commissioner's Office (ICO): <https://ico.org.uk/>

Sharing your information

We value your trust in allowing us to store information and data we collect about you. We use and store your personal information with great care. We do not want to share this with anyone else unless we have your consent, we will never disclose, rent, trade or sell your personal information to any third parties for their marketing purposes or otherwise.

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. This is inclusive of compliance with the Data Protection Act 1998/ GDPR and our Data Policy QA499 information requirements.

How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analytic purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website

How to reject and delete cookies

Should you wish to reject or block the use of cookies, you can do so at any time, usually by clicking 'Help' on your browser.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Controlling your personal information

You may choose to restrict the collection or use of your personal information in the following ways:

- Whenever you are asked to complete a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anyone other than Sidey for direct marketing purposes.
- If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at admin@sidey.co.uk

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so.

We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.

Consent

In cases where we need your consent to process your information, we will ask you to make a positive indication (e.g. to tick a box or insert your contact details on the relevant form - document or web page requiring consent). By actively providing us with your consent, you are stating that you have been informed as to the type of personal information that will be processed, the reasons for such processing, how it will be used, for how long it will be kept, who else will have access to it and what your rights are as a data subject and that you have read and understood this privacy policy. You may request details of personal information which we hold about you under the Data Protection Act 1998 and GDPR. A small administration fee will be payable. If you would like a copy of the information held on you please write to.

The Marketing Department
Sidey Solutions Ltd,
57 Feus Road,
Perth
PH1 2 AX

If you believe that any information we are holding on you is incorrect or incomplete, please write to us at the above address or email us at admin@sidey.co.uk as soon as possible. We will promptly correct any information found to be incorrect.

G. McKenna



Joint Managing Director

Date: 23/05/2018