

# Privacy policy

## 1. Introduction

- 1.1 We are committed to safeguarding the privacy of Ashwell Systems' website visitors and service users.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of Ashwell Systems' website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We use cookies on Ashwell Systems' website. Insofar as those cookies are not strictly necessary for the provision of Ashwell Systems' website and services, we will ask you to consent to Ashwell Systems' use of cookies when you first visit Ashwell Systems' website.
- 1.4 Ashwell Systems' website incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications and limit the publication of your information. You can access the privacy controls via *URL*.
- 1.5 In this policy, "we", "us" and "Ashwell Systems'" refer to *data controller name*. For more information about us, see Section 13.

## 2. Credit

- 2.1 This document was created using a template from SEQ Legal (<https://seqlegal.com/free-legal-documents/privacy-policy>).

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## 3. How we use your personal data

- 3.1 In this Section 3 we have set out:
  - (a) the general categories of personal data that we may process;
  - (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
  - (c) the purposes for which we may process personal data; and
  - (d) the legal bases of the processing.
- 3.2 We may process data about your use of Ashwell Systems' website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is Ashwell Systems' analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for

this processing is consent OR Ashwell Systems' legitimate interests, namely monitoring and improving Ashwell Systems' website and services OR *specify basis*.

- 3.3 We may process your website user account data ("**account data**"). The account data may include your name and email address. The source of the account data is you or your employer. The account data may be processed for the purposes of operating Ashwell Systems' website, providing Ashwell Systems' services, ensuring the security of Ashwell Systems' website and services, maintaining back-ups of Ashwell Systems' databases and communicating with you. The legal basis for this processing is consent OR Ashwell Systems' legitimate interests, namely the proper administration of Ashwell Systems' website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract OR *specify basis*.
- 3.4 We may process information that you post for publication on Ashwell Systems' website or through Ashwell Systems' services ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and administering Ashwell Systems' website and services. The legal basis for this processing is consent OR Ashwell Systems' legitimate interests, namely the proper administration of Ashwell Systems' website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract OR *specify basis*.
- 3.5 We may process information contained in any enquiry you submit to us regarding goods and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you. The legal basis for this processing is consent OR Ashwell Systems' legitimate interests, namely the proper administration of Ashwell Systems' website and business OR the performance of a contract between you and us and/or the taking steps, at your request, to enter into such a contract OR *specify basis*.
- 3.6 We may process information relating to transactions, including purchases of goods and/or services, that you enter into with us and/or through Ashwell Systems' website ("**transaction data**"). The transaction data may include your contact details, your card details and the transaction details. The source of the transaction data is you and/or Ashwell Systems' payment services provider. The transaction data may be processed for the purpose of supplying the purchased goods and/or services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract; providing that, if you are not the person contracting with us, the legal basis for this processing is Ashwell Systems' legitimate interests, namely the proper administration of Ashwell Systems' website and business OR *specify basis*.
- 3.7 We may process information that you provide to us for the purpose of subscribing to Ashwell Systems' email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent OR Ashwell Systems' legitimate interests, namely communications with Ashwell Systems' website visitors and service users OR the performance of a

contract between you and us and/or taking steps, at your request, to enter into such a contract OR *specify basis*.

- 3.9 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is Ashwell Systems' legitimate interests, namely the protection and assertion of Ashwell Systems' legal rights, your legal rights and the legal rights of others.
- 3.10 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is Ashwell Systems' legitimate interests, namely the proper protection of Ashwell Systems' business against risks.
- 3.11 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 3.12 Please do not supply any other person's personal data to us, unless we prompt you to do so.

#### **4. Providing your personal data to others**

- 4.1 We may disclose your personal data to Ashwell Systems' insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 4.2 Your personal data held in Ashwell Systems' website database OR *Identify personal data category or categories* will be stored on the servers of Ashwell Systems' hosting services providers identified at *URL*.
- 4.3 We may disclose *specify personal data category or categories* to Ashwell Systems' suppliers or subcontractors identified at *URL* insofar as reasonably necessary for *specify purposes*.
- 4.4 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

#### **5. International transfers of your personal data**

- 5.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).
- 5.2 The hosting facilities for Ashwell Systems' website are situated in *UK*. The European Commission has made an "adequacy decision" with respect to the data protection laws of each of these countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission, a copy of which you can obtain from *source* OR *specify appropriate safeguards and means to obtain a copy*.
- 5.3 *Specify category or categories of supplier or subcontractor* is OR are situated in *specify countries*. The European Commission has made an "adequacy decision" with respect to the data protection laws of each of these countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission, a copy of which can be obtained from *source* OR *specify appropriate safeguards and means to obtain a copy*.
- 5.4 You acknowledge that personal data that you submit for publication through Ashwell Systems' website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

## **6. Retaining and deleting personal data**

- 6.1 This Section 6 sets out Ashwell Systems' data retention policies and procedure, which are designed to help ensure that we comply with Ashwell Systems' legal obligations in relation to the retention and deletion of personal data.
- 6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 6.3 We will retain your personal data as follows:
- (a) usage data will be retained for a minimum period of *6 months* following the date of collection, and for a maximum period of *6 months* following that date;
  - (b) account data will be retained for a minimum period of *6 months* following the date of closure of the relevant account, and for a maximum period of *6 months* following that date;
  - (c) publication data will be retained for a minimum period of *6 months* following the date when the relevant publication ceases to be published on Ashwell Systems' website or through Ashwell Systems' services, and for a maximum period of *6 months* following that date;
  - (d) enquiry data will be retained for a minimum period of *12 months* following the date of the enquiry, and for a maximum period of *12 months* following that date;

- (e) transaction data will be retained for a minimum period of *12 months* following the date of the transaction, and for a maximum period of *12 months* following that date;
  - (f) notification data will be retained for a minimum period of *12 months* following the date that we are instructed to cease sending the notifications, and for a maximum period of *12 months* following that date (providing that we will retain notification data insofar as necessary to fulfil any request you make to actively suppress notifications); and
- 6.4 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **7. Your rights**

- 7.1 In this Section 7, we have listed the rights that you have under data protection law.
- 7.2 Your principal rights under data protection law are:
- (a) the right to access - you can ask for copies of your personal data;
  - (b) the right to rectification - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
  - (c) the right to erasure - you can ask us to erase your personal data;
  - (d) the right to restrict processing - you can ask us to restrict the processing of your personal data;
  - (e) the right to object to processing - you can object to the processing of your personal data;
  - (f) the right to data portability - you can ask that we transfer your personal data to another organisation or to you;
  - (g) the right to complain to a supervisory authority - you can complain about Ashwell Systems' processing of your personal data; and
  - (h) the right to withdraw consent - to the extent that the legal basis of Ashwell Systems' processing of your personal data is consent, you can withdraw that consent.
- 7.3 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.
- 7.4 You may exercise any of your rights in relation to your personal data by written notice to us, using the contact details set out below.

## **8. Amendments**

- 8.1 We may update this policy from time to time by publishing a new version on Ashwell Systems' website.
- 8.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

## **9. Ashwell Systems' details**

- 9.1 This website is owned and operated by *Ashwell Systems*.
- 9.2 We are registered in England and Wales under registration number *7700900077* and Ashwell Systems' registered office is at *114 City Walls Road, Clovenfords, TD1 8FF*.
- 9.3 Ashwell Systems' principal place of business is at *114 City Walls Road, Clovenfords, TD1 8FF*
- 9.4 You can contact us:
  - (a) by post, to *114 City Walls Road, Clovenfords, TD1 8FF*
  - (b) using Ashwell Systems' website contact form;
  - (c) by telephone, on 077 0692 0667; or
  - (d) by email, using [contact@ashwellsystemsuk.co.uk](mailto:contact@ashwellsystemsuk.co.uk).

## **10. Data protection officer**

- 10.1 Ashwell Systems' data protection officer's contact details are:  
[gdpr@ashwellsystemsuk.co.uk](mailto:gdpr@ashwellsystemsuk.co.uk).