

## SECURITY / PRIVACY

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Utilize ('We') are committed to protecting and respecting your privacy.

This policy (together with our terms of use found at terms of use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. Your use of this site confirms your acceptance of the terms and conditions set out in this Use of Website Policy.

For the purpose of the General Data Protection Regulation 2018 (the Act), the data controller is Utilize Plc of registered office 3 Buckingham Court Rectory Lane, Loughton, Essex, IG10 2QZ, Data Protection registration number ZA301633

If you have any queries relating to our use of your personal information, or any other related data protection questions, please contact our Data Protection Representative, email [infosecgroup@utilize.co.uk](mailto:infosecgroup@utilize.co.uk) or write to us at Utilize House, Langley Close, Harold Hill, Romford, RM3 8XB.

### INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- This and all associated websites, are not intended for children and we do not knowingly collect or store any personal information relating to children aged 16 or under.
- Information that you voluntarily provide to us by filling in forms on our site [www.utilize.co.uk](http://www.utilize.co.uk) (our site). This includes information provided at the time of registering to use our site, requesting a catalogue, subscribing to our service, posting material or requesting further services. We may also ask you for information when you report a problem with our site. This information may include your name, e-mail address, company details, mailing address, telephone number, fax number, credit card details and other demographic information.
- Job Applicants - If you provide us with a copy of your CV, this information may also include employment history and other personal details which you have provided. We will use this information for considering your application for employment with us. We may retain this information on file for future reference, as outlined in our retention policy (see below), so that we are able to contact you should a similar job, which we feel may suit your skills, become available.
- If you contact us, we may keep a record of that correspondence or telephone call.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of transactions you carry out through our site and of the fulfilment of your orders.
- Details of your visits to our site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.
- If you are providing us with another person's information you should first, ask them to read this Privacy Policy and our Terms & Conditions. By giving us information about another person you are confirming that they have given you consent to provide the information to us and that they understand how their details will be used.
- You may browse our site without supplying any personally identifiable information, but we will need to collect personally identifiable information in order for you to register on the site, to process your orders, job application or to send you offers or information that you request.

## IP ADDRESSES AND COOKIES

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service.

They enable us:

- to estimate our audience size and usage pattern;
- to store information about your preferences, and so allow us to customise our site according to your individual interests;
- to speed up your searches; and
- to recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

Please note that our advertisers may also use cookies, over which we have no control.

## WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you will not be transferred to, or stored at, a destination outside the European Economic Area ("EEA") unless notified at the point of collection. Where this is necessary, then we will ensure that the locations or suppliers concerned have the relevant requirements in place to ensure compliance to the GDPR. Such suppliers maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Use of Website Policy.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## USES MADE OF THE INFORMATION

We may use information held about you in the following ways:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new client	<ul style="list-style-type: none"> <li>• Identity Information</li> <li>• Contact Data</li> </ul>	Performance of a contract with you

<p>To log and record information to allow us to deliver IT/Communications Services</p>	<ul style="list-style-type: none"> <li>• Identity Information</li> <li>• Contact Data</li> <li>• Profile Data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a Support Contract with you</li> </ul>
<p>To process and deliver your instructions including:</p> <ul style="list-style-type: none"> <li>• Processing orders to deliver agreed goods and services.</li> <li>• Collect and recover money owed to us</li> </ul>	<ul style="list-style-type: none"> <li>• Identity Information</li> <li>• Contact Data</li> <li>• Financial Data</li> <li>• Transaction Data</li> <li>• Marketing Data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests (to recover debts due to us)</li> </ul>
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> <li>• Notifying you about changes to our terms or privacy policy</li> <li>• Asking you to leave a review or take a survey</li> </ul>	<ul style="list-style-type: none"> <li>• Identity Information</li> <li>• Contact Data</li> <li>• Profile Data</li> <li>• Marketing Data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary to comply with a legal obligation</li> <li>• Necessary for our legitimate interests (to keep our records updated, improve our services and to study how customers use our products/services)</li> </ul>
<p>To run, administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> <li>• Identity Information</li> <li>• Contact Data</li> <li>• Technical Data</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</li> <li>• Necessary to comply with a legal obligation</li> </ul>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<ul style="list-style-type: none"> <li>• Identity Information</li> <li>• Contact Data</li> <li>• Profile Data</li> <li>• Usage Data</li> <li>• Marketing Data</li> <li>• Technical Data</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy)</li> </ul>
<p>To use data analytics to improve our website, products/services, marketing, client relationships and experiences</p>	<ul style="list-style-type: none"> <li>• Technical Data</li> <li>• Usage Data</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</li> </ul>

To ensure content is presented in the most effective manner for you	<ul style="list-style-type: none"> <li>• Technical Data</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interest to make sure information is presented to our clients in the most effective manner</li> </ul>
To process job applications made by you	<ul style="list-style-type: none"> <li>• Identity Information</li> <li>• Contact Data</li> <li>• Other Personal data you may include in your CV</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests to grow our business.</li> <li>• Necessary for your legitimate interest in wishing to work for us and grow your working career.</li> </ul>
To make suggestions and recommendations to you about goods or services that may be of interest to you	<ul style="list-style-type: none"> <li>• Identity Information</li> <li>• Contact Data</li> <li>• Technical Data</li> <li>• Usage Data</li> <li>• Profile Data</li> </ul>	Necessary for our legitimate interests (to develop our products/services and grow our business)

For Clarity the terms used above have the following definitions.

- **Identity Information** includes title, first name, last name, username or similar identifier.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Profile Data** includes your username and password, purchases or instructions given by you, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Financial Data** includes bank account details.
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Marketing Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

If you are a new customer or prospect and you have opted in to permit selected third parties to use your data, we (or they), will contact you by electronic means only (email, SMS, telephone). If you have consented to this, you may opt-out at any time by either using the unsubscribe link or by emailing the data protection representative at [infosec@utilize.co.uk](mailto:infosec@utilize.co.uk)

For the purposes of clarity selected 3rd parties mentioned above, will be members of the Utilize Group of companies; Ignite Business Communications Ltd and C2 Software Ltd.

Should we wish to share personal data with any other 3rd parties, then this will be clearly stated, and your specific opt-in will be sought

We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men

aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

## REMARKETING POLICY

We may remarket your information. Remarketing is a way for us to connect with users, based upon your past interactions with the [www.utilize.co.uk](http://www.utilize.co.uk) website. Third-party marketing vendors may be hired by Utilize to perform remarketing services. As a result, third-party vendors, including Google, may show Utilize ads on sites on the internet. Third-party vendors, including Google, use cookies to serve ads based on a user's prior visits to [www.utilize.co.uk](http://www.utilize.co.uk) website.

To opt out of customised Google Display Network ads click [here](#). To find out more about how Google uses any data it collects please visit [http://www.google.com/privacy\\_ads.html](http://www.google.com/privacy_ads.html).

Any information collected is used only for remarketing purposes and will not be used by them for any other purpose.

## DISCLOSURE OF YOUR INFORMATION

We will not disclose personally-identifiable information about you to others except as disclosed in this Use of Website Policy or as authorised by you when the information is collected. We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 736 of the UK Companies Act 1985, including our mail-order catalogue, and online operations in order to send you information that you request, to cater to your shopping preferences, and to extend offers that we believe may be of interest to you.

We may disclose your personal information to third parties:

In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

If Utilize or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of Utilize, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We contract with other companies to fulfil your order and provide the specific products or services to you. For example, we use outside suppliers; a credit card processing company when you make a purchase with a credit card; an outside shipping company to ship orders; and we use outside service providers to host our site. These third parties are provided with only the information that they need to perform their functions and are not permitted to use or disclose your personally-identifiable information for other purposes without your authorisation.

If you shop through our catalogue or via our site and positively opt in, we may share your name and mailing address (but not your email address or telephone number) for external direct mail campaigns conducted by companies or organisations which offer products or services we believe may be of interest to our customers.

## YOUR RIGHTS

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access - you have the right to request a copy of the information that we hold about you.
- Right of rectification - you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten - in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing - where certain conditions apply to have a right to restrict the processing.
- Right of portability - you have the right to have the data we hold about you transferred to another organisation.
- Right to object - you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling - you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Utilize Plc refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined below.

All of the above requests will be forwarded on should there be a third party in the processing of your personal data.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **ACCESS TO INFORMATION**

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Although in accordance with the regulation we will not normally charge for these requests, we may do so if these requests are repetitive, excessive or considered malicious in nature.

Access to your data will only be provided to yourself or a duly authorized representative. Prior to any disclosure, you will be required to provide ID to prove your identity. You will be notified of the ID required when you make any request.

## **SECURITY**

We have numerous safeguards in place to reasonably and adequately protect personally-identifiable information.

Our databases are protected by physical, technical, and procedural measures that restrict information access to authorised persons in accordance with this Use of Website Policy. Our information systems are maintained behind a software firewall to isolate them from access by other networks connected to the Internet. Only employees who need the information to perform a specific job are granted access to personally identifiable information. Our employees are kept up to date on our security and privacy practices.

Any credit card or personally identifying information divulged to us via our site will be stored on secure servers and not released to any other party without your explicit written authorisation unless as expressly provided in this Use of Website Policy. Once you enter a credit card number, we will never

display the entire card number if the page is recalled after you have submitted it. This also applies to the use of the “Back” button on your browser. The middle digits will be displayed as asterisks, protecting your card number from other users of your computer or anyone who happens to see the screen.

Pages on our site that request payment information are protected using SSL (Secure Socket Layer) security, which encrypts any data transmitted. Information passed between your computer and our site cannot be read in the event that someone else intercepts it.

You are responsible for keeping your password to access our site confidential and should never share your password with anyone. We recommend that you your password frequently. After you have finished using our site, you should log out and exit your browser to prevent unauthorised users from returning to your online account. If you believe that someone has improperly used information about you or has made purchases that you did not authorise, please contact us immediately.

## CONSENT

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Utilize Plc to process both types of personal data, but it must be explicitly given for sensitive personal information. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by emailing the data protections representative email: [infosec@utilize.co.uk](mailto:infosec@utilize.co.uk)

## RETENTION PERIOD

Utilize Plc will retain personal data only for as long as is necessary for the purpose outlined in this policy.

When it is no longer necessary to keep personal data, we will delete it as outlined in our data retention policy. This can be requested from the data protection representative by emailing [infosec@utilize.co.uk](mailto:infosec@utilize.co.uk)

In Summary your data will be retained as follows;

- Client data - retained for as long as a customer and minimum of two years thereafter.
- Client data, such as financial, will be retained as long as it is necessary to meet legal obligations
- CV - if unsuccessful, minimum of 6 months, maximum of 1 year
- Prospective clients - retained while contact is maintained, deleted on request or two years post any contact.
- Promotional - if you subscribe to receive any promotional material from us, we will retain your information until you withdraw consent.

## COMPLAINTS

In the event that you wish to make a complaint about how your personal data is being processed by Utilize Plc or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Utilize PLC's data protection representative.

The details for each of these contacts are:

	Supervisory Authority contact details	Data Protection Representative contact details
Contact Name:	Information Commissioner Office	David Tuck
Address line 1:	Wycliffe House	Utilize House
Address line 2:	Water Lane	Langley Close
Address line 3:	Wilmslow	Harold Hill, Romford
Address line 4:	Cheshire	Essex
Address line 5:	SK9 5AF	RM3 8XB
Email:	casework@ico.org.uk	infosec@utilize.co.uk
Telephone:	0303 123 1113	0330 006 9060

## DISCLAIMERS AND INDEMNITY

The information contained in our site is for general guidance on topics selected by Company. Such information is provided on a blind-basis, without any knowledge as to your industry, identity or specific circumstances. The application and impact of relevant laws will vary from jurisdiction to jurisdiction. There may also be delays, omissions, or inaccuracies in information contained in our site. The information on our site is provided with the understanding that Company and various authors and publishers providing such information are not engaged in, and that providing such information does not constitute the rendering of legal or other professional advice or services. As such, information on our site should not be relied upon or used as a substitute for direct consultation with professional advisers.

Our site contains facts, views, opinions, statements, and recommendations of third-party individuals and organisations. None of them or the Company will be liable or responsible for the content including the accuracy, integrity, quality or reliability of any communication, advice, opinion, statement, or other information displayed, uploaded, or distributed through our site or for any errors or violations of laws or regulations. You acknowledge that any reliance on any such communication, opinion, advice, statement, or information will be at your sole risk. The materials on our site are transmitted and distributed “as is” and appear on the site without express or implied warranties, conditions, terms or representations of any kind, including, but not limited to, any implied warranty, condition, term or representation as to satisfactory quality or fitness for a particular purpose and all such warranties, conditions, terms and representations are specifically excluded. There is no warranty, condition, term or representation as to the quality, accuracy, completeness, and validity of any materials on our site, and no warranty, condition, term or representation that the functions contained on the site will be uninterrupted or error-free, or that defects will be corrected.

## INTELLECTUAL PROPERTY

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- provide hypertext links, URL Links, graphic links, hyperlinks or other direct connection for profit or gain to our services without our or the relevant licensee's prior written permission;
- display, publish, copy, print, post or otherwise use our services and the information contained therein for the benefit of any other website without our or the relevant licensee's prior written permission;
- process or otherwise use the information contained on or within our services for any illegal or immoral purpose nor use or process the same unfairly.

You agree and accept that we may publish or otherwise distribute your information and you therefore grant to us an irrevocable, perpetual, non-exclusive right and licence to publish your information and all content contained therein on or within our site, on any other media whatsoever and in its own advertising and promotion.

You therefore hereby undertake to us to indemnify and hold us harmless in full and defend us at your own expense against all claims, liabilities, costs and losses whatsoever and howsoever incurred by us its servants or nominees arising out of any claim made against it in any jurisdiction in the world for infringement of any intellectual property rights of any third party caused by your use of our site and your information.

Utilize, [www.utilize.co.uk], and our logo are trade names or trademarks of Utilize, the use of which is expressly forbidden by any other persons without our express written permission.

We make no warranty or representation in respect of any other trade mark or trading name, symbol or device, all of which are hereby acknowledged. If you have any questions in relation to the use of any marks contained within our services, please contact us at the address below.

## CHANGES TO OUR USE OF WEBSITE POLICY & PRIVACY STATEMENT

This version was last updated 3rd August 2018.

Any changes we may make to our use of website policy or this privacy statement in the future, will be posted on this page.

### LONDON OFFICE

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### ESSEX OFFICE

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