

GDPR: DATA PRIVACY NOTICE FOR CLIENTS AND SUPPLIERS

Introduction

Over The Web Limited ("We") are committed to protecting and respecting your privacy.

This policy (together with our terms of use www.dminf.co.uk/terms 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.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

Over The Web Limited is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: 22 Bower Road, Harrogate, HG1 5BW. For all data matters contact us on 01423 789040.

3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

Business correspondence such as invoicing, quotations, email etc.

Setting up telephone and VoIP services such as names on telephones, contact names for services, telephone names and numbers as part of the setup and running of the telephone systems.

Direct Debit payment requests, bank payments.

You may give us information about you by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you report a problem or have a query.

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

Personal data: name, email address, business IP address if fixed, mobile telephone number, direct dial number, business telephone numbers, bank account details.

Special categories of data – we do not hold or store any data that is determined to fall in to this section.

We have obtained your personal data from yourselves either as part of a previous business document for example list of user names to be given telephone numbers or for software relevant to our business where we are required to configure equipment for individual users or to nominate users as contacts.

5. What is our legal basis for processing your personal data?

a) Personal data (article 6 of GDPR)

Our lawful basis for processing your general personal data:

<input type="checkbox"/> Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract	MAINTENANCE CONTRACT
<input type="checkbox"/> Processing necessary for compliance with a legal obligation	LEGAL AND BINDING ORDERS FOR BROADBAND, TELEPHONE LINES
<input type="checkbox"/> Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject	Configuring telephones for specific users. Having points of contact for a customer. Information needed to complete orders on systems such as those provided by British Telecom or similar suppliers of Over The Web Ltd.

b) Special categories of personal data (article 9 of GDPR)

N/A

More information on lawful processing can be found on the [ICO website](#).

6. Sharing your personal data

Your personal data will be treated as strictly confidential and will not be shared with any other company.

7. How long do we keep your personal data?

We keep personal data for no longer than reasonably necessary, typically for the period that a person is employed by a customer in order to be able to support the relevant (telephone/VoIP, broadband etc) provided systems of that customer or by that person for the customer.

Upon confirmation that a person has left a customer (usually the customer will have to formally notify us of this through our helpdesk system) we will evaluate the impact of deleting the relevant personal data and work to resolve any issues that said deletion may impose.

8. Providing us with your personal data

You are under no statutory or contractual requirement or obligation to provide us with your personal data. It should be noted though that in some cases where Service Level Agreements (SLA) are in place, lack of information may lead to breaking the SLA until appropriate information is authorised and obtained.

9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- [THE RIGHT TO WITHDRAW YOUR CONSENT TO THE PROCESSING AT ANY TIME, WHERE CONSENT WAS YOUR LAWFUL BASIS FOR PROCESSING THE DATA];
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority)); direct marketing and processing for the purposes of scientific/historical research and statistics).
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10. Transfer of Data Abroad

WE DO NOT TRANSFER PERSONAL DATA OUTSIDE THE EEA.

11. Automated Decision Making

WE DO NOT USE ANY FORM OF AUTOMATED DECISION MAKING IN OUR BUSINESS.

12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

13. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

14. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact any member of staff on 01423 789040.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email) on 03031231113 or via email [https://ico.org.uk/global/contact-us/email/](https://ico.org.uk/global/contact-us/email) or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.