



PROTECTING YOUR PRIVACY

Privacy Notice

CONTENTS

1. Introduction.....	3
2. Controller and Processor Roles	3
3. Explaining the legal bases we rely on.....	3
4. When do we collect your personal data?	4
5. What sort of personal data do we collect?	5
6. How and why do we use your personal data?.....	5
7. How we protect your personal data.....	7
8. How long will we keep your personal data?	8
9. Who do we share your personal data with?	8
10. Where your personal data may be processed.....	9
11. What are your rights over your personal data?	10
12. How can you stop the use of your personal data for direct marketing?	11
13. Contacting the Regulator	11
14. If you live outside the UK.....	12
15. Any questions?	12

1. Introduction

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data and keep it safe.

We know that there's a lot of information here, but we want you to be fully informed about your rights, and how Red Maple uses and processes your data.

We hope the following sections will answer any questions you have but if not, please do get in touch with us.

For simplicity throughout this notice, 'we' and 'us' means Red Maple.

It's likely that we'll need to update this Privacy Notice from time to time. We'll notify you of any significant changes.

2. Controller and Processor Roles

Red Maple is:

- a Controller and Processor of Personal Data relating to our employees and customers
- a Processor of Personal Data relating to your customers

Red Maple is the Data Controller and Processor for your personal data when you or your employees (for example):

- use a contact form on our website
- use the Client Portal
- call us, or interacting with us to raise a support/change request, enquire about our services or to enquire about a Statement of Work

Red Maple is a data processor under the control of your Data Controller when we act under a Statement of Work when (for example):

- We backup your data which contains Personal Data you have gathered in the course of your business
- We change security permissions to data at the request of your Data Controller
- We carry out any Statements of Work that require us to migrate/delete Personal Data under the direction of your Data Controller

3. Explaining the legal bases we rely on

The law on data protection sets out several different reasons for which a company may collect and process your personal data, including:

Consent

In specific situations, we can collect and process your data with your consent.

- For example, when you tick a box to receive email newsletters

When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service.

Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations.

For example, if you'd like us to provide support to your company, we may need your name, email and date of birth to confirm you are who you say you are.

Legal compliance

If the law requires us to, we may need to collect and process your data.

For example, we can pass on details of people involved in fraud or other criminal activity affecting us to law enforcement.

Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

For example, we will use your service incident history to recommend solutions to help reduce issues and reduce calls.

We also combine the incident history of many clients to identify trends and ensure we can keep up with demand or common issues or develop new products/services.

4. When do we collect your personal data?

- When you visit any of our websites
- When you enter into a contract with us
- When you engage with us on social media
- When you contact us by any means with queries, complaints etc
- When you ask one of our employees to email you information about a product or service
- When you enter prize draws or competitions
- When you choose to complete any surveys we send you
- When you comment on or review our products and services
- When you fill in any forms. For example, when some on site work is completed, one of our employees may collect your personal data

- When you've given a third party permission to share with us the information they hold about you
- When you visit our office, which has CCTV systems operated for the security of both customers and employees. These systems may record your image during your visit

5. What sort of personal data do we collect?

- If you have or your employer has a contract with us: your name, date of birth, billing/delivery address, orders and receipts, email and telephone number. For your security, this information is encrypted
- Details of your interactions with us through the helpdesk, onsite visits or by using the client portal

For example, we collect notes from our conversations with you, details of any complaints or comments you make, details of issues you had and how and when you contact us.

- Copies of documents you provide to prove your age or identity where the law requires this (including your passport and driver's licence). This will include details of your full name, address, date of birth and facial image. If you provide a passport, the data will also include your place of birth, gender and nationality
- Details of your visits to our websites or client portal, and which site you came from to ours
- Payment card information
- Your comments and product reviews
- Your image may be recorded on CCTV when you visit our office
- Your car number plate may also be recorded
- Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback

6. How and why do we use your personal data?

We want to give you the best possible service experience. One way to achieve that is by combining the data we have about you.

We then use this to ensure our service is meeting your needs, protecting your business and that other services and products we offer will benefit you.

The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service.

Of course, if you wish to change how we use your data, you'll find details in the 'What are my rights?' section below.

Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for.

For example, we may not be able to carry out service resolution issues if you've removed your general consent to hear from us.

Here's how we'll use your personal data and why:

- To process any orders that you make by using our client portal, change request or a purchase order. If we don't collect your personal data, we won't be able to process your order and comply with our legal obligations

For example, your details may need to be passed to a third party to supply or deliver the product or service that you ordered, and we may keep your details for a reasonable period afterwards in order to fulfil any contractual obligations

- To respond to your queries, refund requests and complaints. Handling the information you sent enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience
- To protect our business and your business from fraud and other illegal activities. This includes using your personal data to maintain, update and safeguard your account. We'll do all of this as part of our legitimate interest

For example, by checking your password when you login to the client portal and using automated monitoring of IP addresses to identify possible fraudulent log-ins from unexpected locations

- To protect our customers, premises, assets and employees from crime, we operate CCTV systems at our office and car park which record images for security. We do this on the basis of our legitimate business interests
- To process payments and to prevent fraudulent transactions. We do this on the basis of our legitimate business interests. This also helps to protect our clients from fraud
- If we discover any criminal activity or alleged criminal activity through our use of CCTV, fraud monitoring and suspicious transaction monitoring, we will process this data for the purposes of preventing or detecting unlawful acts. Our aim is to protect the individuals and businesses we interact with from criminal activities
- With your consent, we will use your personal data, preferences and details of your transactions to keep you informed by **email, web, text, telephone** and through our contact centres about relevant products and services including tailored special offers, discounts, promotions, events, competitions and so on. Of course, you are free to opt out of hearing from us by any of these channels at any time

- To send you relevant, personalised communications **by post** in relation to updates, offers, services and products. We'll do this on the basis of our legitimate business interest. You are free to opt out of hearing from us by post at any time
- To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Privacy Notice, product recall notices, and legally required information relating to your orders. These service messages will not include any promotional content and do not require prior consent when sent by email or text message. If we do not use your personal data for these purposes, we would be unable to comply with our legal obligations
- To develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate business interests
- To comply with our contractual or legal obligations to share data with law enforcement

For example, when a court order is submitted to share data with law enforcement agencies or a court of law

- To send you survey and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to do so as this helps make our products or services more relevant to you and allows us to correct any issues you've had with our service. Of course, you are free to opt out of receiving these requests from us at any time by updating your preferences in the client portal
- To process your booking/site appointment requests (for example for an install or migration). Sometimes, we'll need to share your details with a third party who is providing a service (such as delivery couriers or an engineer). We do so to maintain our appointment with you. Without sharing your personal data, we'd be unable to fulfil your request

7. How we protect your personal data

We know how much data security matters to all our clients. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it.

We secure access to all transactional areas of our websites, monitoring tools and client portal using SSL or 'https' technology.

Access to your personal data is password-protected, and all data is secured and encrypted to ensure it is protected.

We regularly monitor our systems for possible vulnerabilities and attacks, and we carry out penetration testing to identify ways to further strengthen security.

8. How long will we keep your personal data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

Some examples of customer data retention periods:

Orders

When you place an order or enter into a contract, we'll keep the personal data you give us for six years so we can comply with our legal and contractual obligations. In the case of certain products, we'll keep the data for 10 years.

Warranties

If your order included a warranty, the associated personal data will be kept until the end of the warranty period.

9. Who do we share your personal data with?

We sometimes share your personal data with trusted third parties.

For example, delivery couriers, technicians visiting your home, for fraud management, to handle complaints, to help us personalise our service to you and so on.

Here's the policy we apply to those organisations to keep your data safe and protect your privacy:

- We provide only the information they need to perform their specific services
- They may only use your data for the exact purposes we specify in our contract with them
- We work closely with them to ensure that your privacy is respected and protected at all times
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous

Examples of the kind of third parties we work with are:

- Other IT companies who support our website and other business systems

- Operational companies such as delivery couriers and telecoms providers
- Direct marketing companies who help us manage our electronic communications with you
- Data insight companies to ensure your details are up to date and accurate

Sharing your data with third parties for their own purposes:

We will only do this in very specific circumstances, for example:

- With your consent, given at the time you supply your personal data, we may pass that data to a third party for their direct marketing purposes

For example, if you enter a vendor competition and tick a box agreeing that the vendor company can send you promotional information directly. Or if we run a joint event with a supplier, and you agree to receive direct communications from them.

- For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies
- We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration
- We may, from time to time, expand, reduce or sell the business and this may involve the transfer of divisions or the whole business to new owners. If this happens, your personal data will, where relevant, be transferred to the new owner or controlling party, under the terms of this Privacy Notice
- For further information please contact our Data Protection Officer

10. Where your personal data may be processed

Sometimes we will need to share your personal data with third parties and suppliers outside the European Economic Area (EEA).

International clients

If you or your employees are based outside the UK and place a service request or order with us, we will transfer the personal data that we collect from you to Red Maple in the UK.

Protecting your data outside the EEA

The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway. We may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA.

For example, this might be required in order to fulfil your order, process your payment details or provide support services.

If we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the EEA. For example, our contracts with third parties stipulate the standards they must follow at all times. If you wish for more information about these contracts please contact our Data Protection Officer.

Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Privacy Notice.

11. What are your rights over your personal data?

An overview of your different rights

You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases
- The correction of your personal data when incorrect, out of date or incomplete
- For example, when you withdraw consent, or object and we have no legitimate overriding interest, or once the purpose for which we hold the data has come to an end (such as the end of a warranty)
- That we stop using your personal data for direct marketing (either through specific channels, or all channels)
- That we stop any consent-based processing of your personal data after you withdraw that consent
- Review by an employee of any decision made based solely on automatic processing of your data (i.e. where no human has yet reviewed the outcome and criteria for the decision)

You have the right to request a copy of any information about you that Red Maple holds at any time, and also to have that information corrected if it is inaccurate.

To ask for your information, please contact the **Data Protection Officer, Red Maple, The Cowbarn, East Wallhouses, Newcastle upon Tyne, NE18 0LL**, or email subject.access.request@red-maple.co.uk.

To ask for your information to be amended, please update your information on the client portal, or contact our Customer Services team.

If we choose not to action your request we will explain to you the reasons for our refusal.

Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

Direct marketing

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

12. How can you stop the use of your personal data for direct marketing?

There are two ways you can stop direct marketing communications from us:

- Click the 'unsubscribe' link in any email communication that we send you. We will then stop any further emails.
- Write to **Data Protection Officer, Red Maple, The Cowbarn, East Wallhouses, Newcastle upon Tyne, NE18 0LL.**

Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

13. Contacting the Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling [0303 123 1113](tel:03031231113).

Or go online to www.ico.org.uk/concerns (opens in a new window; please note we can't be responsible for the content of external websites)

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence. Details can be found in Section 14.

14. If you live outside the UK

For all non-UK customers

By using our services or providing your personal data to us, you expressly consent to the processing of your personal data by us or on our behalf. Of course, you still have the right to ask us not to process your data in certain ways, and if you do so, we will respect your wishes.

Sometimes we'll need to transfer your personal data between countries to enable us to supply the goods or services you've requested. In the ordinary course of business, we may transfer your personal data from your country of residence to ourselves and to third parties located in the UK.

By dealing with us, you are giving your consent to this overseas use, transfer and disclosure of your personal data outside your country of residence for our ordinary business purposes.

This may occur because our information technology storage facilities and servers are located outside your country of residence, and could include storage of your personal data on servers in the UK.

We'll ensure that reasonable steps are taken to prevent third parties outside your country of residence using your personal data in any way that's not set out in this Privacy Notice. We'll also make sure we adequately protect the confidentiality and privacy of your personal data.

15. Any questions?

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that haven't been covered, please contact our Data Protection Officer who will be pleased to help you:

- Email us at **dpo@red-maple.co.uk**
- Or write to us at **Data Protection Officer, Red Maple, The Cowbarn, East Wallhouses, Newcastle upon Tyne, NE18 0LL**

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