
PRIVACY NOTICE

BACKGROUND:

Image Retail Solutions Ltd understands that your privacy is important to you and that you care about how your personal data is used. **We** respect and value the privacy of all of **our** clients and will only collect and use personal data in ways that are described here, and in a way that is consistent with **our** obligations and your rights under the law.

1. Information About Us

Image Retail Solutions Ltd.

Limited company registered in England under company number 9450326.

Registered address: 19 Chiswell Road, Poole, Dorset BH17 9FB.

VAT number: 206729213

Data Protection Officer: Mr Darren Windsor.

Email address: darren@imagesoft.co.uk.

Postal address: 19 Chiswell Road, Poole, Dorset BH17 9FB.

We are regulated by the Financial Conduct Authority as firm number 675961.

2. What Does This Notice Cover?

This Privacy Information explains how **We** use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that **We** use is set out in Part 5, below.

4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which **We** will always work to uphold:

- a) The right to be informed about **our** collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data **We** hold about you. Part 10 will tell you

how to do this.

- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that **We** hold. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. **We** do not use your personal data in this way.

For more information about **our** use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data **We** hold about you changes, please keep us informed as long as **We** have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about **our** use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. **We** would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 11.

5. What Personal Data Do You Collect and How?

Depending upon your use of **our** products/services, **We** may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. **We** do not collect any 'special category' or 'sensitive' personal data **AND/OR** personal data relating to children **AND/OR** data relating to criminal convictions and/or offences.

Data Collected	How We Collect the Data
Identity information, including your title and full name	When you place an order with us, we collect this using from the order form you complete at checkout, or over the phone, or by email.
Your contact information including your address, phone number and email address.	We also collect this when you place your order with us.

Business information including business name, trading address and VAT number.	We also collect this when you place your order with us.
Payment information including card details (or bank details where you pay by Direct Debit).	We collect this when you place your order through our website, or when you give us the information over the phone.

6. How Do You Use My Personal Data?

Under the Data Protection Legislation, **We** must always have a lawful basis for using personal data. The following table describes how **We** may use your personal data, and **our** lawful bases for doing so:

What We Do	What Data We Use	our Lawful Basis
Administering our business.	Your personal details, business details and payment information.	This information is necessary for us to perform our contract with you. We may also have a legal obligation to provide your information to the authorities.
Supplying our products and/or services to you.	Your personal details and your business details.	This information is necessary for us to perform our contract with you.
Managing payments for our products and/or services.	Your personal details, business details and payment information.	This information is necessary for us to perform our contract with you.
Communicating with you.	Your personal information.	This information is necessary for us to perform our contract with you.
Supplying you with information by email and/or post that you have opted-in-to (you may opt-out at any time by contacting us).	Your personal information and your business details.	A legitimate interest in keeping you updated on products/services that might interest you, or those you are currently using.

With your permission and/or where permitted by law, **We** may also use your personal data for marketing purposes, which may include contacting you by email **and/or** telephone **and/or** post with information, news, and offers on **our** products / services. You will not be sent any unlawful marketing or spam. **We** will always work to fully protect your rights and comply with **our** obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. **We** will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We will only use your personal data for the purpose(s) for which it was originally collected unless **We** reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If **We** do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.

If **We** need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, **We** will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, **We** may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

7. **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Identity Information including name and title	For no longer than we are legally obliged to hold this information following closure of your account with us.
Contact information including address, email address and telephone number	For no longer than we are legally obliged to hold this information following closure of your account with us.
Business information including business name, trading address and VAT number.	For no longer than we are legally obliged to hold this information following closure of your account with us.
Payment information including card details (or bank details where you pay by Direct Debit).	No longer than 12 months after your last payment to us.

8. **How and Where Do You Store or Transfer My Personal Data?**

We will only store or transfer your personal data within the UK. This means that it will be fully protected under the Data Protection Legislation.

9. **Do You Share My Personal Data?**

We the exception of legitimate debt recovery purposes, **we** will not share any of your personal data with any third parties for any purposes, subject to the following exceptions:

If **We** sell, transfer, or merge parts of **our** business or assets, your personal data may be transferred to a third party. Any new owner of **our** business may continue to use your personal data in the same way(s) that **We** have used it, as specified in this Privacy Policy.

In some limited circumstances, **We** may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. **How Can I Access My Personal Data?**

If you want to know what personal data **We** have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover **our** administrative costs in responding.

We will respond to your subject access request not more than one month after receiving it. Normally, **We** aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date **We** receive your request. You will be kept fully informed of **our** progress.

11. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Mr Darren Windsor):

Email address: darren@imagesoft.co.uk.

Postal Address: 19 Chiswell Road, Poole, Dorset BH17 9FB.

12. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if **We** change **our** business in a way that affects personal data protection.

Any changes will be made available through our website. This Privacy Notice was last updated on 31st January 2019.