

PRIVACY NOTICE

DAYTA DESIGNS LIMITED

Introduction & Contents

Dayta Designs Limited (**Dayta, we, our, us**) respects your privacy and is committed to protecting your personal data. This privacy notice explains how we use and protect the personal data you provide to us. It also explains your privacy rights and protections.

We have tried to keep this privacy notice simple without compromising on the information provided to you. We have therefore broken it down into the following sections, each of which you can skip to directly by clicking the relevant headings. You can also download a pdf version of the policy here www.dayta.co.uk/privacypolicy.

SECTION	HEADING
1.	Important information & our details
2.	The data we collect about you
3.	How your personal data is collected
4.	How we use your personal data
5.	Disclosures of your personal data
6.	International transfers
7.	Data security
8.	Data retention
9.	Your legal rights

1. **Important information & our details**

Purpose of this privacy notice

This privacy notice gives you information about how we collect and process personal data you provide to us, including any data you provide via our website (<https://www.dayta.co.uk/>) (our **Site**), when you register with us, use our platform (**Platform**), receive services, make an enquiry, sign up to any newsletters or marketing information or book any of our events. This privacy notice should be read together with any other privacy notice or fair processing notice we may provide when we are collecting or processing personal data about you. This privacy notice supplements any other notices and is not intended to override them.

Our business offering is not intended for children and we do not knowingly collect data relating to children.

Our contact details and role

We are the data controller responsible for your personal data. Our full details are:

- Name: Dayta Designs Limited
- Company registration number: 01932302
- Data protection registration number: ZA344850
- Data privacy manager: Office Manager
- Email address: claire@dayta.co.uk
- Postal address: Riverside House, 44 Wedgewood Street, Fairford Leys, Aylesbury, Bucks, HP19 7HL
Telephone number: +44 (0)1296 770007

If you have any questions about this privacy notice, including any requests to exercise your legal rights (see section 9 below), please contact the data privacy manager using the details set out above.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) (www.ico.org.uk), which is the supervisory authority for UK data protection issues. However, we ask that you contact us in the first instance and give us the opportunity to address your concerns before you consider contacting the ICO.

Changes to the privacy notice and your duty to inform us of changes

The data protection law in the UK will change on 25 May 2018. Although this privacy notice sets out most of your rights under the new laws, we may not yet be able to respond to some of your requests (for example, a request for the transfer of your personal data) until 25 May 2018 as we are still working towards getting our systems ready for some of these changes.

It is important that the personal data we hold about you is accurate and current, so please let us know if your personal data changes at any time.

Third-party links

Our Site and our Platform may include links to third-party websites, vendor offerings or other applications, plug-ins and/or applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Site, you should read the privacy notice of any website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer the following kinds of personal data about you, which we have summarised into categories:

- **Identity Data** includes first name, last name (previous or current), username or similar identifier, marital status, title, date of birth, gender, job title.
- **Contact Data** includes billing address, delivery address, other branch addresses, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us. There will be times when we require access to your other company transactional data, specifically as part of our customer support service and in order to resolve any software issues you experience. Should we take a copy of your finance data and load on our network, it will only be used for testing and support purposes and is kept within an isolated virtual environment. It is then safely and securely deleted. This also applies to any passwords you give us to access that data.
- **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.
- **Profile Data** includes your username and password (although we do not retain any customer passwords), purchases or orders made by you, events attended, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

The above categories are used as defined terms elsewhere in this privacy notice, in particular section 4.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform our obligations under our contract with you. In that case, we may have to cancel a product or service but we will notify you if so.

3. How your personal data is collected

We use different methods to collect your personal data including:

- **Directly from you.** You may give us your Identity, Contact and Financial Data by completing any of our website forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you
 - apply for our products or services;
 - book a place at any of our events;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey;
 - use our technical support services; and/or
 - provide feedback.
- **Automated technologies or interactions.** As you interact with our Site or our Platform, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy (<https://www.dayta.co.uk/cookies/>) for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Contact details from your website
 - Technical Data from the following parties:
 - (a) analytics providers such as Google based outside the EU;
 - (b) search information providers such as Google based inside or outside the EU.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as asset finance companies based inside or outside the EU.
 - Identity and Contact Data from data brokers or aggregators such as marketing companies based inside or outside the EU.



- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform our contractual obligations to you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Legitimate Interest means the interest of conducting and managing our business to enable us to give you the good services/products and a good and secure experience. We consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). Please contact us if you would like any further guidance concerning how we assess legitimate interests against any potential impact on you.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and legal bases we rely on in doing so. We have also identified what our legitimate interests are where appropriate.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver goods or services to you including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)



<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity (b) Contact (c) Profile (d) Marketing and Communications</p>	<p>(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business, our Site and our Platform (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) 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) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our Site, Platform, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>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)</p>

To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
---	--	---

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms regarding our marketing activities:

- *Promotional offers from us*

We may use your Identity, Contact, Technical, Usage and Profile Data to decide what we think you may want or need, or what may be of interest to you.

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

- *Third-party marketing*

We will get your express opt-in consent before we share your personal data with any third party company for marketing purposes.

- *Opting out*

You can ask us or third parties to stop sending you marketing messages at any time by logging into the Site and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites use cookies. If you disable or refuse cookies, you may be unable to use some parts of our Site and/or our Platform properly or at all. For more information about the cookies we use, please see <https://www.dayta.co.uk/cookies/>.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- The following external third parties:
 - Service providers acting as processors based in the UK who provide IT and system administration services.
 - Service providers acting as processors based in the UK who provide supplementary software and services and whom you authorise us to contact.
 - Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
 - HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers] based in the United Kingdom who require reporting of processing activities in certain circumstances.

- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally

lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for taxation and regulatory purposes.

With respect to any other personal data, we will only retain it for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of



a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.