

Ninehundred Communications Group

GDPR and Privacy Policy Statement

Rev No	Nature of change		Author	Date
01	First Issue			May 2018
01	Annual Review			05 May 2019
01	Annual Review		Tina Elvy	23 June 2020
02	Update to UK GDPR Regs following Brexit		Tina Elvy	10 March 2021
02	Annual Review		Tina Elvy	28 June 2021
03	Update Cookie Compliance Tool		Alan Nuttall	06 January 2022
03	Annual Review		Robyn McCord	May 2023
04	Update Cookie Compliance Tool		Alan Nuttall	September 2023

GDPR and Privacy Policy

The UK General Data Protection Regulation (UK GDPR) sets out seven key principles which lay at the heart of the general data protection regime.

Ninehundred Communications Group are dedicated to safeguarding the personal information under our control and in maintaining a system that meets our obligations under the regulations.

This policy sets out how we will process any personal data we collect from you, or that you provide to us.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

1. Lawfulness, fairness, and transparency principle

To comply with the first principle, Ninehundred Communications Group will process personal data lawfully, fairly and in a transparent manner in relation to the data subject.

Ninehundred Communications Group only collect.

- Name, contact information including email address, demographic information such as postcode.
- Details of your enquiry/ or existing contract information

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data and you can also exercise the right - at any time - by contacting us at gdpr@ninehundred.co.uk

Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing

2. Purpose limitation principle

To comply with the second principle, Ninehundred Communications Group will only collect personal data for a specific, explicit, and legitimate purpose. This means personal data submitted on our site will be used for the purposes specified in this privacy policy.

We may use your personal data to:

1. carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us.
2. to notify you of any changes to our services
3. send statements and invoices to you and collect payments from you.
4. provide you with information about other goods and services that we offer, which are similar to those that you have already enquired about.

5. comply with our statutory and regulatory obligations.
6. to ensure content from our site is presented in the most effect manner for you.
7. deal with enquiries and complaints made by or about you relating to the site.

The legal grounds on which we use this information are:

- To allow us to perform our contract with you (point 1, 2 and 3 above)
- To allow us to exercise legitimate interests as a data processor (point 4 and 5 above)
- Based on your explicit consent (point 6 and 7 above)

3. Data minimisation principle

To comply with the third principle, Ninehundred Communications will ensure that the personal data we are processing is adequate, relevant and limited to what is necessary.

Ninehundred Communications Group only collect:

- Name, contact information including email address, demographic information such as postcode.
- Details of your enquiry/ or existing contract information.

Where you chose to have a relationship with Ninehundred Communications Group, such as a contractual or other business relationship, we will continue to contact you in connection with that business relationship until permission is withdrawn.

We do not collect any sensitive personal data about you, such as information about your race, political opinions, or religious beliefs - unless we obtain your explicit consent. In addition, we do not knowingly collect personal data from - or direct our content towards - those under the age of 16.

4. Accuracy principle

The accuracy principle requires Ninehundred Communications Group to take all reasonable steps:

- to ensure the personal data we hold, or process is not incorrect or misleading
- that the source and status of personal data is clear
- to carefully consider any challenges to the accuracy of information
- to consider whether it is necessary to periodically update the information.

Ninehundred Communications Group will carry out daily updates as required, archiving or securely deleting information from our live system in line with our 6 years' retention policy

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please write to us at or email us at gdpr@ninehundred.co.uk

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

5. Storage limitation principle

To comply with the storage limitation principle, Ninehundred Communications Group will not keep personal data for longer than needed. You must also:

We only keep your personal data for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

Ninehundred Communications Group review and assess customer data 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.

Customer records are retained for 6 years to meet our legal and regulatory requirements or the length of the contract, whichever is the longest. After this time, data is deleted from our live system.

Where there has been no business activity with a named contact for 2 years Ninehundred Communications Group will contact to determine if consent is still valid or not.

6. Integrity and confidentiality (also known as the security principle)

To comply with the security principle, Ninehundred Communications Group have put in place physical, electronic and managerial procedures to safeguard and secure the information we collect and hold.

Information is stored on a secure server, within the UK. We do not store information on the cloud.

We do not sell, rent or share personal information with any other organisations.

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

Any payment transactions will be encrypted using SSL technology. Where we have given you - or where you have chosen - a password that enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

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. As such, 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.

7. Accountability principle

The accountability principle requires Ninehundred Communications Group to take responsibility for what we do with personal data and how we comply with the other principles.

Ninehundred Communications have appropriate measures and records in place to be able to demonstrate our compliance.

Complying with these seven principles is essential to good data protection practice and fundamental to compliance with the provisions of the UK GDPR.

Your Rights

You have certain rights in relation to personal information processed by us. These include:

- The right to object to the use of your personal information for marketing purposes (as set out above).
- The right to request a copy of your personal information, along with information relating to its use.
- The right to request that your personal information is erased, subject to certain restrictions.
- The right to request a copy of your personal information in a commonly readable format.

You can contact us regarding this Privacy Policy or to exercise your rights by contacting us on:

Telephone: 01302 368866

Email: gdpr@ninehundred.co.uk

How we use cookies

A cookie is a small file which is placed on your computer's hard drive when you are browsing the internet. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

Cookies are sometimes referred to as "first party" (cookies placed by this website) and "third party" (cookies placed by external websites we link to).

Cookies placed by our website

Overall, cookies help us provide you with a better website experience by allowing you to interact with us and enabling us to monitor which pages you find useful and which you do not. The cookies we place in no way give us access to your computer or any information about you.

Many of our webpages include the function to contact us using our contact forms and use of these forms sets a session cookie - without this the form will be ineffective and this cookie would be therefore considered strictly necessary.

We also use traffic log (analytics) cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to

customer needs. We only use this information for statistical analysis purposes and to ensure that we are providing relevant content and to improve the experience for our website visitors.

Necessary Cookies

Some of the cookies our website sets are to allow core functionality, for example, we use a content management system and extensions that use session cookies on key functionality such as contact forms – without them the forms will be ineffective and are therefore considered as necessary. They are also used for search functionality, filtering and categorisation.

Necessary cookies include:

Unique strings such as afd98d1c97f7bbf266a7cfbbb7b785cc are session cookies that expire when your browser is closed.

reDimCookieHint is a cookie that registers your preference to accept or decline cookies and is therefore necessary.

Videos

We embed videos from our official YouTube channel using YouTube's no-cookies mode and from our Vimeo account using their do not track feature.

However, we also provide links to appropriate product related videos which are outside our own channel and therefore over which we have no control.

Where we have embedded videos outside our own channel / account, it will be stated on the page.

Visitor Experience

If you have accepted cookies, from time to time we use a system to record interactivity on our website. This records clicks and taps on elements of the page such as menu links and buttons and helps us understand how the site is being used and to identify what is of most interest to visitors or what may be causing a poor visitor experience, enabling us to implement improvements. This system cannot identify you as an individual.

These cookies are pre-fixed with _hj

We also use an interactive map for our customers to find us - if you accept cookies a number will be set by Google, our map provider.

Cookie Control

Web browsers have been moving towards blocking cookies by default but not all do this.

Personal browser preferences and settings also vary meaning cookies might or might not be blocked by the browser.

Through the use of a Cookie Control Tool you can choose to accept or decline cookies when you visit our website.

Note that a cookie will be placed to recognise your preferences.

[Find out more about managing cookies \(external link to aboutcookies.org\).](https://aboutcookies.org)

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to access this content, you should note that if it is not one of our websites we do not have any control over that website. Therefore, we cannot be held responsible for the

content, protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Cookies placed by other websites

We have no control over the cookies placed by other websites (third party cookies).

We provide links to information we feel relevant and also links to the main social networks such as Twitter, Facebook, LinkedIn Instagram and Vimeo. We recommend that you refer to their privacy policy.

For enhanced website functionality we have embedded some external content within our own webpages and some third party cookies will be placed. Currently these include:

- Video - Equipment manufacturer videos delivered by YouTube (owned by Google). We have taken steps to remove external adverts from our video pages
- Maps - Our contact pages include Google Maps as a tool to assist with locating our office



Robert Rees
Managing Director
September 2023