

PRIVACY STATEMENT

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Privacy Statement

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1. PRIVACY OVERVIEW

This privacy notice provides you, the data subject, with details of how we collect and process your personal data.

Jacqueline Offen is responsible for ensuring that this notice is made available to data subjects prior to J & J Systems UK Limited collecting or processing their personal data in any form.

All employees of J & J Systems UK Limited have been trained to ensure this notice is shown or drawn to the attention of data subjects during any interaction where data is collected or processed and that data is processed with your consent.

2. WHO WE ARE

J & J Systems UK Limited is the data controller and we are responsible for your personal data. Within this document we will be referred to as “we”, “us” or “our”.

We are a Managed Service Provider for Small to Medium Enterprise (SME) Organisations, we offer a variety of services related to Information Technology, including network and workstation monitoring, anti-virus software, email and email scanning services, online backup and business continuity.

You can contact us in several ways if you would like to discuss your data;

Email: We have a general contact email address of mail@jjsystems.co.uk

Postal address: Unit 28 Miners Way, Lakesview International Business Park, Hersden, Canterbury, Kent CT3 4LQ

Telephone: +44 (0)1227 371375

3. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when legally permitted and we do not collect data of a sensitive nature such as racial, ethnic or political nature.

The most common uses of your personal data are:

- In the performance of a contract between us.
- 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.

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email.

You do have the right to withdraw consent to marketing at any time by emailing us at mail@jjsystems.co.uk

4. PURPOSES FOR PROCESSING YOUR PERSONAL DATA

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please email us at mail@jjsystems.co.uk if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order 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 owed to us
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(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
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(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>To administer and protect our business and our site (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 content and advertisements to you and measure and understand the effectiveness of our advertising</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 website, 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 site updated and relevant, to develop our business and to inform our marketing strategy</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p>	<p>Necessary for our legitimate interests to develop our products/services and grow our business</p>

5. MARKETING COMMUNICATIONS

You will receive marketing communications from us if you have:

- (i) requested information from us or purchased goods or services from us; or
- (ii) if you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications; and
- (iii) in each case, you have not opted out of receiving that marketing.

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

You can ask us or third parties to stop sending you marketing messages at any time by emailing us at mail@jjsystems.co.uk at any time.

Where you opt out of receiving our marketing communications, 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.

6. 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 2 above:

- Service providers who provide additional IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

7. INTERNATIONAL TRANSFERS

Countries outside of the European Economic Area (**EEA**) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria.

Only one of our third parties service providers are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or

- Where we use providers based in the United States, we may transfer data to them if they are part of the EU-US Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

Please email us at mail@jjsystems.co.uk if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

8. RETENTION PERIOD

We will only retain your personal data 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.

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 tax purposes.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR RIGHTS AS A DATA SUBJECT

Under certain circumstances, you have rights under data protection laws in relation to your personal data – including;

- Right of access to your personal data.
- Right of rectification of your personal data.
- Right of erasure of your personal data.
- Right of restriction of processing your personal data.
- Right to Object to processing of your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.
- Right to judicial review; in the event that J & J Systems refuses your request under rights of access, we will provide you with a reason as to why, you have the right to complain as outlined in Clause 7.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at mail@jjsystems.co.uk.

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.

We will request some 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.

J & J Systems accepts the following forms of ID when information on your personal data is requested:

Passport, photo driving licence, birth certificate, utility bill (from last 3 months)

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.

10. 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 such data. 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.

11. COMPLAINT

If you are not happy with any aspect of how we collect and use your data, you have the right to complain both to the responsible data protection representative for J & J Systems UK Limited – Jacqueline Offen, at mail@jjsystems.co.uk and to the the UK supervisory authority for data protection issues the Information Commissioner’s Office (ICO) (www.ico.org.uk). Of course we should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

12. ACCURACY

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at mail@jjsystems.co.uk