



# Privacy Policy (General)

## Document Details

### Description

This document is a privacy policy covering client personal data. For data stored within Esferico applications, see a separate policy document.

This document was originally adapted from the GDPR EU project funded by the European Union.

### History

Effective date of this document: 3<sup>rd</sup> December 2020

Document Owner: Esferico Ltd.

Version	Date	Description	Author
1.0	[unknown]	Initial author	GDPR EU
1.1	2018-09-21	Adaption to Esferico Ltd.	ESF-VPT
1.2	2020-12-03	Adaption to reflect UK GDPR implementation.	ESF-CR
1.3	2021-02-26	Updated ICO registration reference.	ESF-CR

## Privacy Policy

This privacy policy will explain how our organization uses the personal data we collect from you when you use our website and/or purchase a product from us. Note that this privacy policy does not cover personal data stored by yourself in Esferico Ltd. Products.

## What Data Do We Collect?

Our Company collects the following data:

- Personal identification information (Name, email address, phone number, etc.)

## How do we collect your data?

You directly provide Our Company with most of the data we collect. We collect data and process data when you:

- Register online or place an order for any of our products or services.
- Voluntarily complete a customer survey or provide feedback on any of our message boards or via email.
- Use or view our website via your browser's cookies.

- Has been passed to use via an intermediate support organisation (e.g. local council, educational library service etc.)

Esferico Ltd. does not use data provided to use about you from any other sources.

## What Data Do We Do With The Data We Collect?

Our Company collects your data so that we can:

- Process your order and manage your account.
- Email you with application or industry related information regarding services that may benefit you.

Our company does not routinely share any personal information with other agencies, though on occasion we may be required to pass your information onto others in the case of credit agencies in order to prevent fraudulent purchases.

## How Do We Store Your Data?

Our Company securely stores your data at within 3<sup>rd</sup> party business and accounting systems which are protected by high levels of security, and can only be accessed by suitably authorised Esferico Ltd staff who are tasked with administration roles.

These include:

- Microsoft Office365
- Sage Accounting

Our Company will keep your personal and organisational data for a period of 12 months following termination of any product purchased or subscribed from us. Once this time period has expired, we will delete your data by within the applications listed.

## Marketing

Our Company would like to send you information about products and services of ours that we think you might like, which are connected with or directly provided by applications which you have purchased / subscribed to.

If you have agreed to receive marketing, you may always opt out at a later date.

You have the right at any time to stop Our Company from contacting you for marketing purposes or giving your data to other members of the Our Company Group.

If you no longer wish to be contacted for marketing purposes, please click contact [support@esferico.net](mailto:support@esferico.net)

## What are your Data Protection Rights?

Our Company would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

- The right to access – You have the right to request Our Company for copies of your personal data. We may charge you a small fee for this service.

- The right to rectification – You have the right to request that Our Company correct any information you believe is inaccurate. You also have the right to request Our Company to complete the information you believe is incomplete.
- The right to erasure – You have the right to request that Our Company erase your personal data, under certain conditions.
- The right to restrict processing – You have the right to request that Our Company restrict the processing of your personal data, under certain conditions.
- The right to object to processing – You have the right to object to Our Company’s processing of your personal data, under certain conditions.
- The right to data portability – You have the right to request that Our Company transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at

Our email: [dpo@esferico.net](mailto:dpo@esferico.net)

Call us at: 0208 123 7979

## Cookies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

For further information, visit [allaboutcookies.org](http://allaboutcookies.org).

## How Do We Use Cookies?

Our Company uses cookies in a very small range of ways to improve your experience on our website or in cloud-based applications, including:

- Keeping you signed in
- Understanding how you use our website
- Provide fast re-login processes by re-populating commonly used fields

## What Types of Cookies Do We Use / Not Use ?

There are a number of different types of cookies, however, our website uses:

**Functionality** – Our Company uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.

**Advertising** – Our Company uses not cookies connected with advertising, marketing or tracking of commercial interests or purchases.

## How to Manage Cookies

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

## Privacy Policies of Other Websites

Our Company website contains links to other websites. Our privacy policy applies only to our website and websites directly under our control, so if you click on a link to another website, you should read their privacy policy.

## Changes to our Privacy Policy

Our Company keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 26<sup>th</sup> February 2021.

## How to Contact Us

If you have any questions about Our Company's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Our email: [dpo@esferico.net](mailto:dpo@esferico.net)

Call us at: 0208 123 7979

## How to Contact Us

Should you wish to report a complaint or if you feel that Our Company has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office.

Website: <https://ico.org.uk>