

## Smartworks Company Privacy Policy

Smartworks is part of Spiralbridge Ltd. We respect your right to privacy and this policy will explain how our organisation uses the personal data we collect from you when you use our website. We will never release personal data to third parties for marketing purposes and will only disclose personal information when it is necessary for delivering a service requested by you or if required to be released by law.

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### What data do we collect?

Smartworks collects data from you when you sign up to receive more information, fill out a form on our website or register to attend an event. We may collect, use, store and transfer different types of personal information including:

- Your name and contact details such as phone number, address, email address and telephone numbers
- Information about how you use our website
- Details regarding your marketing and communication preferences
- Technical Data which could include internet protocol (IP) address, 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.

### How do we collect, use and store your data?

#### Collecting your data

You directly provide Smartworks with most of the data we collect. We collect 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.
- Subscribe to our publications and notifications
- Request information to be sent to you

- Register to attend any of our events
- Give us feedback

Our Company may also receive your data indirectly from the following sources:

- Technical Data from the following parties: analytics providers such as Google based outside the EU, advertising networks and search information providers;
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

### **Using your data**

Our Company collects your data so that we can:

- Manage your account and provide our services to you
- Email you with updates and details of other services. (If you have agreed to receive marketing, you may always opt out at a later date).
- Deliver the requirements of the contract we have with you or about to enter with you
- Deliver our legitimate interests which means conducting and managing our business to give you the best and most secure service.
- Comply with a legal requirement

When Smartworks processes your order, it may send your data to, and also use the resulting information from, credit reference agencies to prevent fraudulent purchases.

Generally we do not rely on consent as the basis for processing and using your personal data. If however we expressly tell you that we are relying on consent, then you can withdraw that consent at any time.

### **Storing your data**

Smartworks securely stores your data on commercial cloud based servers or on encrypted mobile devices. We limit access to your personal data to those employees, contractors and formal partners 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 breach or loss of personal data and will notify you and any applicable regulator of a suspected breach where we are legally required to do so

We will only keep your data for as long as necessary to fulfill the purposes for which we are collecting it. This includes for the purposes of satisfying any legal accounting or reporting requirements. After this time we will securely destroy your personal information

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

We may retain your personal information on file on the basis that a further opportunity may arise in the future and we may wish to consider you for that. We will only do this if you have given your explicit consent for us to retain your details for this purpose as part of the recruitment process.

### **Your data Protection Rights**

Smartworks wants to ensure you are fully aware of all of your data protection rights. Every user is entitled to the following:

**Access** - You have the right to request copies of your personal data.

**Rectification** - You have the right to request that we correct any information you believe is inaccurate or incomplete

**Erasure** - You have the right to request that we erase your personal data, under certain conditions.

**Restrict Processing** - You have the right to request that we restrict the processing of your personal data, under certain conditions.

**Object to processing** - You have the right to object to us processing of your personal data, under certain conditions.

**Data Portability** - You have the right to request that we transfer the data that we have collected to another organisation, 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 [privacy@smartworkagency.com](mailto:privacy@smartworkagency.com) or contact us using the details at the end of this notice

### **Cookie use**

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

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Smartworks uses cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in
- Understanding how you use our website
- Personalising your experience

One or more of the following cookie type may be used:

**Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

**Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

**Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

**Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

#### **Privacy policies of other websites**

The Smartworks website may contain links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

#### **Changes to our privacy policy**

Smartworks keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 10 May 2019

#### **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.

Email us at: [privacy@smartworkagency.com](mailto:privacy@smartworkagency.com)

Call us: 0333 987 5099

Or write to us at: 42 Charlotte Square, Edinburgh, EH2 4HQ

Our website is intended for adults and we do not knowingly collect data from children

#### **How to contact the appropriate authority**

Should you wish to report a complaint or if you feel that we have not addressed your concerns in a satisfactory manner, you may contact the Information Commissioner's Office.

The Information Commissioner's Office - Scotland

45 Melville Street

Edinburgh

EH3 7HL

Telephone: 0303 123 1115

Email: [Scotland@ico.org.uk](mailto:Scotland@ico.org.uk)