

# **Privacy Policy**

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### 1. Introduction

This policy explains when, why and how we collect personal information from the people who visit our website, sign up or purchase any of our services or request or contact us in any other manner. The policy also details the conditions under which we may disclose the information to others and how we keep it secure.

While we encourage clients to read our privacy policy in full, we do have a number of guiding principles we operate our company by:

- We will never sell your data on.
- We will **never** share your data with any third parties.
- We will **always** keep your personal data secure using strong encryption, abiding by data protection rules and by implementing good security practice.
- We will never send you direct email marketing.

If you are ever concerned or have question about how your personal data is collected or used, please contact us at admin@firenetsystems.org.uk

You can read our full privacy policy below.

### 2. About us and our third party suppliers

FireNet Systems Ltd. Is a private limited company and is registered at the following address:

The Cambrook **High Street** Chipping Campden Gloucestershire **GL55 6AT** 

Company Number: 12816044

FireNet Systems employs the services of a third party supplier for the cloud hosting of all products developed for its customers that request a hosted solution.

Webhosting UK COM LTD is part of the Hyperslice group which includes eUKhost LTD, Webhosting UK COM LTD and Hyperslice LTD and is registered at the following address:

Suite 1, 7 Commercial Street, Morley Leeds **LS27 8HX** 

Company number: 6471390 ICO registration No: Z3409264

This policy (together with our terms of use Terms and Conditions and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Act 1998 (the Act) and GDPR (General Data Protection Regulation), the data controller is Webhosting UK COM LTD, a company registered in England and Wales under company number Webhosting UK COM.

### 3. When do we collect your personal data

We may collect data about you in the following ways:

- By filling in forms through any of our websites & systems, this includes information provided at the time of registering to use our services, subscribing to any of our services, or requesting further services. We may also ask you for information if you report a problem with our site or systems.
- If you contact us, we may keep a record of that correspondence.
- Details of transactions you carry out through our systems and of the fulfilment of your
- Using our systems, including, but not limited to, traffic data, location data and other communication data required for our own security, diagnostic, authentication and billing.

### 4. What personal data do we collect

If you are simply viewing our website, then we will collect the following information within our logs:

IP Address (See cookies and IP addresses)

If you sign up to use our services, we will then collect the following information:

- Name
- Address
- Email Address(s)
- Telephone number(s)

While not actively collected we may store any other personal information that you may disclose during live chat, support tickets or emails.

### 5. Cookies and IP Addresses

#### **IP Addresses**

We collect IP address information for security (DDoS prevention, anti-hacking and fraud prevention), diagnostics and statistical analysis of traffic used for improvements to the performance and usability of our services, for GDPR purposes we collect this information under legitimate interest.

#### **Cookies**

A cookie is a small file saved on your computer that is used to help store preferences and other information that is used by pages within our systems you may visit.

We use cookies for the Following:

- Authentication of users when logging in or out of our services.
- Analysis of traffic to our website via Google Analytics (see Google Analytics).
- Tracking of website preferences.
- Storing search requests (but only for the life of that particular session)

If you register with us or if you continue to use our services, you agree to the use of cookies.

You can block cookies by activating the setting in your browser which allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies you may not be allowed access to all or parts of our systems.

Unless you have adjusted your browser settings so that it will refuse cookies, our system will issue cookies as soon as you login to our systems.

### 6. Where we store and process your personal data

The data that you provide within all of our systems is stored in the data centres of WebHosting UK within the United Kingdom on our behalf when you subscribe to our cloud hosting services. Employees of WebHosting UK do not have access to this data and only manage the servers and backups of our systems. FireNet Systems will backup data twice daily (12pm & 6pm Mon-Fri). FireNet Systems technical staff have access to systems, services and data for the purposes of development and maintaining the systems and services you subscribe to.

We take all steps necessary to ensure that your data, regardless of where it is processed, is treated securely and in accordance with this privacy policy and the GDPR (General Data Protection Regulation) which includes Webhosting UK's certification to ISO27001 standard.

### 7. How we Protect your personal data

We treat all data with the utmost care and take appropriate steps in compliance with data protection regulation to ensure it is kept safe.

- All data we collect is done so over encrypted connections (https).
- All data is stored behind state of the art firewalls managed by the security team at Webhosting UK
- All data is access controlled to ISO27001 standards.
- All systems storing personal data have access logging.
- All passwords are encoded at rest.
- All systems are subject to regular penetration testing and are monitored for vulnerabilities and attacks.

### 8. Uses we make of personal data

We use information held about you in the following ways:

- To verify your identity.
- To provide you with the products and services you have purchased from us.
- To carry out our obligations arising from any contracts entered into between you and us.
- To ensure that content from our systems is presented in the most effective manner for your device.
- To respond to queries.
- To provide you with information, products or services that you request from us where you have consented to be contacted.
- To notify you about changes to our services.
- To prevent fraud.
- To detect, prevent and diagnose potential security breaches.

## 9. Legal basis for the collection and processing

Data protection law sets out the conditions under which personal data can be collected and which we use as the basis for collection and processing, these include:

#### **Contractual obligations**

When you purchase a service, we need to collect personal data to fulfill our legal contractual obligation, for example: so we can manage and invoice your account and contact you for technical support purposes.

#### Legal compliance

The law requires we collect and process data for certain purposes such as for keeping financial records (i.e. invoicing) and that we can comply with law enforcement requests for data.

#### **Legitimate interest**

We collect data under legitimate interest in a way that is reasonably expected as part of the day to day running of our business.

For example, we collect and log IP addresses for fraud protection and security as well as analysis of our site usage.

## 10. How long we keep personal data

Your data will be kept until it is no longer required for the purpose of its collection.

At the end of the retention period the data will either be deleted so it can no longer be linked back to an individual.

Personal data linked to purchases or any other financial transaction are kept for a minimum of 6 years as required by UK law to retain financial data.

### 11. Who we share personal data with

All data provided by you is not shared with any third party individual or organisation.

### 12. Ads and Remarketing

Our systems do not use Google AdWords remarketing services.

### 13. Disclosure of your personal information

We may disclose if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions of supply Terms and Conditions and other agreements; or to protect the rights, property, or safety of our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

#### 16. External links

Our site may, from time to time, contain links to and from the websites of our partners. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

# 17. Your rights under GDPR

Under GDPR (General Data Protection regulation) you have a number of rights relating to your personal data, these will come into force on the 25<sup>th</sup> May 2018, for further information please see <a href="https://ico.org.uk">https://ico.org.uk</a>

#### **Right to Restrict Processing**

You have the right to request we restrict processing of your personal data where there is no legitimate interest for us to do so:

- Where the accuracy of the personal data is contested, to restrict the processing until such time as the accuracy has been sufficiently verified.
- Where you object to the processing (See Right to Object), and where we are considering whether there are legitimate grounds to override the request.

- When processing is unlawful and you oppose erasure and request restriction instead.
- If we no longer need the personal data but you require the data to establish, exercise or defend a legal claim.

You can exercise the right at any time by contacting our team (see Contacting Us).

#### Right of Access (Access to Information)

The GDPR Act gives you the right to access information held about you.

You can exercise this right by contacting us (see Contacting Us).

We are required to verify your identify before processing any right to access request, once verified the data shall be provided within 28 days.

The data shall be provided free of charge however an admin fee may be applied where a request is manifestly unfounded or excessive, particularly if it is repetitive.

#### Right to Erasure (Also known as the right to be forgotten)

As an individual you have the right to request the erasure of any data we hold on you, this is not an absolute right, for example it does not override our requirement under UK law to keep financial data such as invoice information.

You can make a request where your personal data is no longer necessary in relation to the purpose for which it was originally collected/processed, for example if you cancel all services you have with

To make a right to erasure request please contact our customer services team (see Contacting Us).

#### **Right to Rectification**

The GDPR provides the right to have any personal data rectified that may be incorrect or incomplete.

Customers can update their own personal details via the client area however if this is not sufficient please contact our customer services team (See contacting Us).

#### **Right to Object**

You have the right to object to the processing of your personal data where there is no legitimate or lawful reason to do so.

To make a right to object request please contact our customer services team (see Contacting Us).

# 18. Changes to our privacy policy

We keep our privacy policy under regular review, you can always find the latest version at the URL below:

https://firenetsystems.org.uk/docs/privacy\_policy.pdf

# 19. Contacting us

Questions, comments and requests regarding this privacy policy are welcomed, you can contact us in the following ways:

- Existing customers can contact us by creating a ticket through their client area.
- Email us at admin@firenetsystems.org.uk
- Call us on 0333 772 9398
- Or write to us at: FireNet Systems Ltd. The Cambrook, High Street, Chipping Campden,
  Gloucestershire. GL55 6AT