

CLARITAS SOLUTIONS LIMITED

PRIVACY POLICY

Introduction

Claritas Solutions Limited (**Claritas**) is a provider of data security software and solutions, hosting services and IT support services.

As such, the issue of information security is key to us as it is central to our business and the products and services which we offer.

As a provider of such products and services, the standards of security which we apply to all data which we handle are of extremely high standards. This also applies to the personal data which we hold as part of the data which we handle more generally.

About this policy

Like other organisations, Claritas is required to adhere to the General Data Protection Regulation (“**GDPR**”) and other related legislation which relates to the use of personal data.

The main purpose of this privacy policy is to explain how we handle the personal data which we hold, (including the personal data we may collect when you use this website at www.claritas-solutions.com or otherwise which we collect if you get in touch with us in other ways for example if our representatives meet face to face or if you telephone us) and the personal data about you and others which we use in order to provide services to the organisation which you represent.

It also explains in very general terms, how we handle personal data which forms part of the data which we may process on behalf of our clients. However, given the very nature of the security solutions which we offer, the way in which we handle the particular data sets belonging to our clients (including any personal data which falls within them) will inherently vary according to the specifics of the arrangements with particular clients. Accordingly, the detail of the arrangements for the handling of that data is subject to the agreements which we have in place with our clients and is not covered in any detail in this policy.

In addition to explaining how we handle personal data, this policy also explains the rights of those persons about whom we hold personal data in accordance with the GDPR and other related legislation which relates to the use of personal data.

We may change this policy from time to time by updating this page.

Additional information may be provided on particular pages of this website for example, on any specific pages where we collect personal data and you should also refer to those.

We also operate cookies on our website and information about that is also provided separately in our [Cookies Policy](#).

It is important that you read this privacy policy together with any other statements or fair processing

notices we may provide on specific occasions when we collect or process personal data, so that you are fully aware of how and why we are using your data. This privacy policy supplements those other notices.

Contacting us

For the purposes of the personal data which we collect for our purposes, Claritas Solutions Limited is a Data Controller and is responsible for the handling of that personal data. Where Claritas handles personal data which belongs to and is controlled by its clients, Claritas acts as a Data Processor only.

We have also appointed a Data Protection Officer (details below) who has responsibility within Claritas for dealing with GDPR compliance matters.

If you have any questions about this privacy notice, including any requests to exercise your legal rights or if you have any other questions about how we handle personal data, please contact us, using the following details:

Contact name: Claritas Data Protection Officer - Assured Information Security Ltd

Address: 2 Deighton Close, Wetherby, West Yorkshire, LS22 7GZ, United Kingdom.

Email: ClaritasGDPR@claritas-solutions.com

Tel: 0845 639 9661

You have the right to make a complaint to the Information Commissioner's Office (ICO) which is the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, like the opportunity to assist you with any concerns before you approach the ICO so please contact us in the first instance using the details above.

Your obligations

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

If you provide us with information about any other person, for example any other individuals within your organisation or your business partners, then you must ensure that you have their consent if appropriate or other necessary authority, to pass those details to us and for us to use those details in accordance with this privacy policy. You should also make sure that you bring this policy to their attention.

Note that the situations in which clients for whom we perform our services may pass third party personal data to us will vary and be very specific to the arrangement we have in place with them. To the extent necessary, such matters will be dealt with in accordance with the contract which we have in place with our clients.

Third-party links

This website may include links to third-party websites, plug-ins and applications. For example, we

provide links to our social media pages on Facebook, Twitter, Instagram and LinkedIn. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control any of those third-party websites and are not responsible for their privacy policies. We recommend that you read any policies and other statements on such websites carefully and ensure that you are happy with them before providing any personal data to such third-party organisations.

The personal data we hold

Personal data means any information about an individual from which that person can be identified. It does not include data which is anonymised so that a person's identity is removed.

We may collect, use, store and transfer different kinds of personal data. We operate on a business to business basis, and accordingly, the personal data which we collect via our website or which for example, you may give to us over the phone or at a sales meeting is provided to us and used by us in the context of our business operations and the business operations of the organisation which you represent. The categories of personal data which we use include:

- **Identity and Contact Data** such as names, titles and other identifiers together with business address, email addresses and telephone numbers.
- **Technical Data** which may include internet protocol (IP) address, access times, your login data, browser type, 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 and where relevant, the Claritas portal. This may also include information about how you use our website and our products and services.
- **Profile Data** such as username and password details you use to log in to the Claritas portal.
- **Marketing and Communications Data** includes preferences in receiving marketing from us, and your communication preferences.

How is personal data collected?

We may collect personal data from you in a number of ways. Most often, it is collected directly through the website, for example, if you provide certain contact data when you complete the form on our "Request for Information" page. We may also collect personal data over the phone or through face to face interactions. The personal data we collect will be provided directly from you or in some cases, might be provided by your colleagues.

Some of the technical data which we collect may be collected automatically as you interact with our website for example via the use of cookies and similar technologies.

Purposes for which we use personal data

We will use your personal data in accordance with the requirements of GDPR.

The information below explains the purposes for which we use different categories of personal data and the legal basis or bases which we believe applies to those uses. We may process your

personal data for more than one lawful basis depending on the specific purpose for which we are using data.

Operating our website and portal

We may process your identity and contact data, technical data and profile data, for the purposes of administering and operating our website. This may include troubleshooting, data analysis, testing, system maintenance and support and website hosting. Where relevant, it may also include processing your data in order to provide access to and to administer the Claritas portal which we may make available to some of our clients from time to time.

By using data for these purposes, it helps us to continually improve our website and the way in which it operates and we do this on the basis that this is necessary for our legitimate interests in managing, administering and improving this website and our portal service.

Contact for services and account administration

We will also process your identity and contact data in order to provide and deliver our products and services to your company, and to deal with any ancillary matters such as sending invoices and administering payment from your company, corresponding with you in relation to the company's order and assisting with any follow up issues. We process your data in this way on the basis that it is necessary to do so for the performance of the relevant contract that the organisation which you represent may have entered into with us. For example, it may be necessary for us to deal with queries and support questions as part of our helpdesk service which may arise from time to time and we will need a named point of contact and relevant contact information to deal with those.

Similarly, we may also collect personal data from you if you are a supplier of products or services to us or if you are a third party providing a related service to one of our clients. Again, this information will be identity and contact data so that we can deal with enquiries between us, to buy products and/or services from you where relevant and otherwise to facilitate a proper working relationship between us. We do this either because it is necessary for the performance of a contract to which we may be subject or otherwise where it is in our legitimate interests for us to carry on our business operations.

To the extent that a contract for service performance may involve the handling of personal data of third parties which you make available to Claritas then that data is handled in connection with and on the basis that it is necessary for, the performance of the relevant contract for services.

General enquiries

If you contact us with a comment, enquiry (for example, through our "Request for Information" page) or if you want to speak to us, we will use your identity and contact data in order to respond to you. Processing your data in this way is necessary for our legitimate interests in the operation of our business in order to provide our customer service to you.

Marketing information

We may from time to time, contact you with marketing communications such as information about

our services or upcoming events, or to tell you about other products and services we offer which we think may interest you. To do this we will use your identity and contact data, and may also use your technical, profile and marketing and communications data.

We will only do this if you have agreed to be included on our marketing database or in some cases where the organisation which you represent has purchased goods or services from us. We ask for the consent of persons who make an enquiry with us via our Request for Information Form, to send marketing communications and we also ask by what means you wish to receive those types of communication.

Email marketing messages may contain tracking or similar technologies in order to track subscriber activity within email marketing messages. Where used, those marketing messages may record data relating to user engagement with our website and already stored subscriber data.

We process personal data for marketing purposes as it is necessary for our legitimate interests to develop, market and promote our products and services and to grow our business by seeking new sales and clients.

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time, using the contact details above shown in the section in this policy above entitled "Contacting Us".

If data is not provided to us

Where we need to collect personal data for example, under the terms of a contract we have with the organisation you represent or for another valid reason and you fail to provide that data, we may not be able to fully perform our obligations in accordance with our contract, provide you with the information you require or otherwise properly deal with your request.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please also note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

If you would like further information about how we use personal data and the purpose which we might use it for, please contact us.

Data transfers

We do not transfer any personal data outside of the EU.

Data security

We take appropriate technical and organisational precautions and security measures to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered or

disclosed. We also limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know it. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Given the nature of the services which we provide and the IT security solutions which we make available, we also treat data which we process on behalf of our clients in a highly secure and confidential manner. Such matters are dealt with in accordance with our contracts which we have in place with our clients.

Data retention

We will only retain 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 in a different way, the terms of any agreement which we may have in place with our clients as relevant and other, applicable legal requirements.

In some circumstances, we may anonymise personal data (so that it can no longer be associated with the person to whom it pertains) for research or statistical purposes in which case we may use this information for ongoing periods of time.

Legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Those rights are listed below. Please contact us if you would like to exercise any of them.

The following is a high-level summary of the types of rights which data subjects may have (depending on the exact circumstances) under the GDPR. Please note that any such right would be handled according to the specifics in any given case. Individuals have a right to:

- **Request access** to their personal data (a “data subject access request”). This means you can receive a copy of the personal data we hold about you and control and to check that we are lawfully processing it.
- **Request correction** of personal data: This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** A person may ask us to remove personal data where there is no good reason for us continuing to process it. You also have this right where you have successfully exercised your right to object to processing, where we may have processed your data unlawfully or where we are required to erase your personal data to comply with law. We may not always be able to comply with your request where there are particular legal reasons for doing so.
- **Object to processing** of your personal data where we rely on a legitimate interest basis and if

the processing impacts on your fundamental rights and freedoms. You can also object to direct marketing. Please see further information in this policy above about the way in which you can unsubscribe from receiving marketing communications. In some cases, we may demonstrate that we have grounds to process your data which override your rights and freedoms.

- **Request restriction of processing.** You can ask us to suspend the processing of your personal data: if you want us to establish the data's accuracy; where our data use is unlawful but you do not want us to erase it; where you need us to hold the data even if we no longer need it, to establish, exercise or defend legal claims; or you have objected to use of data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request a data transfer.** We will provide to you, or your chosen third party, your personal data in a structured, commonly used, machine-readable format. This only applies to automated information which you provided consent for us to use or necessary to perform a contract with you.
- **Withdraw consent at any time** where we rely on consent to process your personal data. This will not affect the lawfulness of processing carried out before you withdraw your consent.

Exercising your rights

You will not have to pay a fee to access your personal data (or to exercise any 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 may need to request 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 personal data is not disclosed to a person who has no right to receive it. We may also contact you to ask you to clarify your request to speed up our response.

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 which case we will keep you updated.

Claritas Solutions Limited

Updated 15th May 2018