
WAVE 9 - PRIVACY POLICY

BACKGROUND:

At Wave 9 we understand that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, www.wave9.co.uk ("Our Site"). We will only collect and use personal data in ways that are described here, and in a way that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

- | | |
|--------------------------|--|
| "Applicable Laws" | means (a) European Union or Member State laws with respect to Personal Data in respect of which We or you are subject to EU Data Protection Laws; and (b) any other applicable law with respect to Personal Data in respect of which We or you are subject to any other Data Protection Laws; |
| "Personal Data" | means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR"); and |
| "We/Us/Our" | means Wave 9 Managed Services Limited, a limited company registered in England under company number 0755965 whose registered and main trading address is 1 Hargreaves Court, Dyson Way, Staffordshire Technology Park, Stafford, ST18 0WN. |
| "Cookie" | means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Site are set out in Part 14 of this Privacy Policy; and |
| Cookie Law" | means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003; |

2. **Information About Us**

Our Site is owned and operated by Wave 9 Managed Services Limited, a limited company registered in England under company number 0755965.

Registered and main trading address: 1 Hargreaves Court, Dyson Way, Staffordshire Technology Park, Stafford, ST18 0WN.

VAT number: 169273379

Data Protection Manager: Andrew Mcfarlane (Joint MD)

Email address: dataprotection@wave9.co.uk

Telephone number: +44 (0)1785 472067

Postal Address: 1 Hargreaves Court, Dyson Way, Staffordshire Technology Park, Stafford, ST18 0WN.

3. **What Does This Policy Cover?**

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

4. **What is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. **What Are My Rights?**

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or

purposes.

- g) The right to data portability. This means that, if you have provided personal data to us directly and we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

6. **What Data Do We Collect?**

Depending upon your use of Our Site, we may collect some or all of the following personal and non-personal data (please also see Part 14 on our use of Cookies and similar technologies and our Cookie Policy):

- Name;
- Address;
- Email address;
- Telephone number;
- Business name;
- Job title;
- Profession.

7. **How Do You Use My Personal Data?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for the following purposes:

- Providing and managing your access to Our Site;
- Communicating with you. This may include responding to emails or calls from you.
- Supplying information about Our products and/or services to you;
- Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by selecting the unsubscribe option on our emails or website or by contacting us by email at dataprotection@wave9.co.uk, or by post at 1 Hargreaves Court, Dyson Way, Staffordshire Technology Park, Stafford, ST18 0WN.

- Analysing your use of Our Site to enable us to continually improve Site and your user experience. Where we gather usage analytics this is done in an aggregated anonymised format.

With your express permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message and post with information, news, and offers on products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.

8. **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the as long as we have your consent or a legitimate legal basis for its retention.

9. **How and Where Do You Store or Transfer My Personal Data?**

Wherever practicable your data will only be stored within the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein).

Where necessary some or all of your data may be stored outside of the the EEA. If We do store data outside the EEA (this may be the case, for example, if Our email server is located in a country outside the EEA), We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR by ensuring that data is only held within countries or organisations that meet the permitted transfer regulations:

- a) Within countries which meet Adequacy status provisions as defined within the GDPR. Currently these are Andorra, Argentina, Canada, Faroe Islands, Guernsey, Israel, Isle of Mann, Jersey, New Zealand, Switzerland and Uruguay.
- b) Companies that have signed up to the Privacy Shield Agreement between the EU and the US for transfers to the US in compliance with the GDPR.
- c) Where data is held in other 3rd countries we ensure that specific contracts are in place with external third parties that are approved by the European Commission for the transfer of personal data to third countries. These contracts ensure the same levels of personal data protection that would apply under the GDPR by using a combination of EU approved model contract clauses and binding corporate rules. More information on model contract clauses and binding corporate rules is available from the European Commission.

Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure any data We hold about you (even if it is only your email address:

Steps that We take to secure and protect your data include:

- a) Strong password protection and authentication
- b) 2 factor authentication where applicable

- c) Encryption of data in flight and at rest where applicable
- d) For more information please see our Data Security Policy.

10. **Do You Share My Personal Data?**

We may sometimes contract with third parties to supply or support certain elements of the products and services we provide. Details of these are included in data maps relating to each service which are made available to all prospective customers of those services.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, Our obligations, and the third party's obligations under the law, as described above in Part 9.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 9.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

11. **How Can I Control My Personal Data?**

In addition to your rights under the GDPR, set out in Part 5, when you submit personal data via Our Site, you may be given options to restrict Our use of your personal data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details, or by writing to us or emailing us using the contact details provided in Part 15).

You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

12. **Can I Withhold Information?**

You may access the majority of the areas of Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data, in particular if you request us to contact you in response to a question or requirement.

You may restrict Our use of Cookies. For more information, see Part 14 and Our Cookie Policy.

13. **How Can I Access My Personal Data?**

If you want to know what personal data We hold about you, you can ask Us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15. To make this as easy as possible for you, a Subject Access Request Form is available for you to use on request. You do not have to use this form, but it is the easiest way to tell Us everything We need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover Our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, We aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date We receive your request. You will be kept fully informed of Our progress.

14. How Do You Use Cookies?

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

All Cookies used by and on Our Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended

Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be "strictly necessary". These Cookies are shown in the table below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser's settings as detailed below, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

The following first-party Cookies may be placed on your computer or device:

Name of Cookie	Purpose & Type	Persistence	Strictly Necessary
DYNSRV	Session <i>(used for load balancing to manage server traffic demand)</i>	Session only	yes

Our Site uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used.

The analytics service used by Our Site uses Cookies to gather the required information. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

The Google Universal Analytics service used by Our Site uses the following Cookies:

Name of Cookie	Purpose & Type	First or Third Party	Persistence	Strictly Necessary
_ga	Performance <i>(used to distinguish users by assigning a randomly generated number as a client identifier)</i>	First	2 Years	no
_gid	Performance <i>(used to distinguish users by storing and updating a unique value for each page visited)</i>	First	24 hours	no
_gat	Performance <i>(used to throttle the request rate - limiting the collection of data on high traffic sites. It expires after 10 minutes)</i>	First	1 minute	no

In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

15. **Our Contact Details**

To contact Us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Andrew McFarlane):

Email address: dataprotection@wave9.co.uk

Telephone number: +44 (0)1785 472067

Postal Address: 1 Hargreaves Court, Dyson Way, Staffordshire Technology Park, Stafford, ST18 0WN

16. **Changes to this Privacy Policy**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if We change Our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have

accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.