	GENERAL DATA PROTECTION REGULATIONS MANUAL PROCEDURES and POLICIES		
Original Issue Date:	25 May 2018	PRIVACY & COOKIE POLICY	
Effective Date of Revision:		Document Reference:	GDPR-003

INFORMATION ABOUT US

PDS Communications Limited (“PDS”) is the data controller responsible for protecting the personal information you provide to us and is registered at the UK Information Commissioner’s Office. We are registered in England and Wales under company number 3306440. Our registered office address is; 34 The Hopstore · Old Bexley Business Park · 19 Bourne Road · Bexley · Kent · DA5 1LR

PDS are accredited to ISO 27001:2013 · Certificate Number: IT1110 · Original Approval: 25 March 2011

In accordance with the EU (GDPR) & UK Data Protection Laws, PDS have implemented this Privacy & Cookie Policy to inform you, as prospective customer or supplier to PDS, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data. This Policy should be read alongside our Terms & Conditions. Please also note that this Privacy Policy only applies to personal information obtained by us, not information collected from your interactions with third parties.

This policy explains our practices related to personal data privacy and security including:

- a) Types of personal information we collect;
- b) How we use the information;
- c) With whom we share it;
- d) Rights you may have about the use of your personal information;
- e) Security measures we implement to protect the security of your information; and
- f) How you can contact us about our privacy practices.

This policy applies whether you provide information to us through the PDS website, or when you purchase goods or services from us. Our data protection provisions will appear on our website.

How to contact us

If you have any questions about this Privacy Policy or want to exercise your rights set out in this Privacy Policy, please contact us by sending an e-mail to gdpr@pds-comms.co.uk.


Who is covered under the policy

This policy refers to all parties who provide any amount of information to us; existing and former customers; existing and former suppliers; contractors; consultants; and any other external entity. Generally, our policy refers to anyone we collaborate with or acts on our behalf and may need occasional access to data.

Data Protection Principles

Under EU (GDPR) & UK Data Protection Laws, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose

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- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or Company measures
- g) we comply with the relevant EU (GDPR) & UK Data Protection Laws procedures for international transferring of personal data

What is personal data?

Personal data is information which can be used to detect your identity and includes your name, address, telephone number and email address. Personal data is also information that can be associated with you, together with other information, e.g. your IP address. We will treat all your personal data as confidential (although we disclose this information to carefully selected third-parties in the circumstances set out below).

Collection of personal information

PDS generally collects and stores business contact information from or about you when you interact with us or to fulfil your order and/or provide services to you.

- We collect information in a number of ways which are listed below;
- When you register or use PDS website (the “website”)
- When you are registered on the PDS customer relationship system
- When you are registered on the PDS finance systems
- When you are registered on the PDS customer support ticketing system
- When you contact PDS by telephone, email, LinkedIn, Facebook or Twitter
- When completing any surveys that we send to you for research purposes (although you are under no obligation to complete these)
- When completing any forms for transactional, employment or other purposes
- When you buy products or services
- When you visit our website: we may use cookies to help make the experience of using our website better and to personalise the service you receive from us. This means we may remember your previous visits and track the pages on our website that you visit. For more information please see our Cookie Policy below. When you visit www.pds-comms.co.uk the PDS web server may automatically record your public internet protocol (“IP”) address.
- From time to time, we may also get data about you from third-parties. This could include other customers, partners, agencies or third-parties that we have run partnerships and events with.


Types of information we collect

We only collect the information that is necessary to carry out our business, provide the particular service you have requested and to keep you up to date about all the latest PDS news.

Information we may obtain directly from you

The personal information PDS may collect or that you may choose to provide include:

- Title
- Christian name and surname
- Email address
- Date of birth
- Contact telephone number(s)
- Interactions with us e.g. contacting our Customer Service
- Bank details

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- Delivery address(s)
- Billing address
- Attendance at events
- IP address
- Business contact information (job title, department and name of Company)
- Logs, device information and alerts
- Automatically populated IP address*
- Information from cookies**
- On occasion we may supplement the information we collect about you with outside records from third-parties in order to provide you with information, services or goods you have requested and to enhance our ability to serve you
- Information you provide to third-party service providers retained by us. Where you provide information to us in this way, you will be subject to the relevant service provider’s privacy policy. PDS is not responsible for how those site owners collect and handle your data.

** When visiting our website, we may collect an automatically populated IP address. An IP address is a unique number which allows a computer, group of computers or other internet connected device (such as your mobile or tablet) to browse the internet. We may also record the time and date of your visit, the pages that were requested, the referring website (if provided) and your internet browser version.*

*** For further information about Cookies and how PDS uses them, please read our Cookie Policy below.*

Information we obtain independently from you

Your information may be shared with us by independent organisations for example other organisations that PDS has worked with. These independent organisations will only do so when there is a lawful basis to do so. You should check their Privacy Policy when you provide your information to them to understand fully how they will process and safeguard your data. These independent organisations may include;

Third-Party organisations


We may combine information you have given to us with additional information made available from/shared with us by external sources. This will only be done when we both have a lawful basis to do so.

In addition to information you choose to submit to us, we and our third-party service providers may use a variety of technologies that automatically or passively collect certain information when you interact with us, this may include the browser and operating system you are using, the URL, the time of day you interacted with us, IP address, among other information (“Usage Information”).

Usage Information may also include the unique identifier (“Device Identifier”), automatically assigned to any computer, mobile phone, tablet or other device used to access our website our servers identify your device by its Device Identifier.

Information updates

From time to time we may screen our database against recognised data files such as National Change of Address file to help us keep our database up to date.

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Social Media

Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, you may give us permission to access information from those accounts or services.

Information available publicly

We may include information found in places such as Companies House and information that has been published in for example in articles; newspapers; online.

Use of personal information collected


In order for our use of your personal information to comply with applicable data protection law, that use by us needs to fall under at least one of the specific lawful reasons that are set out in applicable data protection law. PDS may use personal information it collects from you or about you to:

- Establish, develop and preserve its business relationship respectively with you and other individuals with whom it deals;
- Create, establish and administer your accounts;
- Respond to your inquiries;
- Provide the products or services that it offers, or receive the products or services that it requests, and ensure that all related transactions are supported and implemented;
- Authenticate the identity of customers contacting PDS by telephone, electronic means or otherwise;
- Meet legal and regulatory requirements;
- Allow PDS/our business partners who provide delivery fulfilment services to meet contractual requirements relating to the products and services provided to customers;
- Ask for feedback on our services and products;
- For research and analysis purposes to monitor and improve the services we provide including by recording your visits to our website. In these circumstances, we or our agents acting on our behalf, may contact you by email or telephone to ask you for your feedback and comments on our services;
- Operate our business (including developing new services; managing our communications; producing training materials and programmes; determining the effectiveness of and optimising our advertising; analysing our products, services and performing accounting, auditing, billing and reconciliation activities)

PDS may also use personal information it collects for internal purposes, specifically, for:

- Solving technical problems;
- Calculating overall usage statistics;
- Marketing and promotional purposes, product development and content improvement. Unless otherwise required by law, we will obtain your opt in consent before we send you communications related to marketing and promotion.

We may also use aggregated information and statistics for the purposes of monitoring website usage in order to help us develop our websites and our services. We may provide such aggregated information to third-parties, but these statistics will not include information that can be used to identify any individual. We will only keep personal information for as long as necessary to fulfil one or more of the purposes set out above.

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Disclosure of personal information

Except as provided in this policy, or as notified to you at the time we collect your information, PDS will not disclose your personal information to third-parties except as follows:

- With third-parties service providers that perform services on our behalf, including without limitation, those that offer, host or operate our operation;
- To enforce our agreement with you;
- To analyse and enhance our communications and strategies (including by identifying when emails sent to you have been received, read and your location);
- to the extent: permitted by law; necessary to comply with applicable laws or legal processes (e.g., subpoenas); in connection with a merger, acquisition, or liquidation of PDS, in accordance with applicable laws; or to protect the rights or property of PDS. PDS will cooperate with law enforcement authorities.
- If data is disclosed to contractors during commissioned data processing they shall be subject to this policy and, if applicable, to other additional or relevant alternative data privacy provisions and contractual conditions.

Rights regarding the processing of personal data

If you have provided us with personal data, we will keep your information in accordance with our retention policy. You may withdraw your consent to our processing by emailing us and we will apply your preferences in our future communications. If statutory retention periods require further provision, we will lock those records. You may also email us to access information we hold about you, or to request rectification of any personal data we hold about you at gdpr@pds-comms.co.uk

PDS will comply with anti-spam laws which apply in your jurisdiction. Moreover, users may at any time opt out of having their personal information used by PDS to send promotional correspondence to the user, by contacting PDS at the address at the end of this policy.

Collection of personal information from children


PDS does not knowingly collect personal data from children under the age of sixteen (16) from our website. If you are under the age of sixteen (16), please do not submit any personal data through our website. We encourage parents and legal guardians to monitor their children's internet usage and to help enforce our privacy policy by instructing their children never to provide personal data through the website without their permission. If you have reason to believe that a child under the age of 16 has provided personal data to us through our website, please email us at, gdpr@pds-comms.co.uk and we will endeavour to delete that information from our database.

How long do we keep your personal information for?

We keep your personal information in line with our company Retention Policy. We only retain information for as long as it is required.

Security of data

The security of individuals' personal information is important to PDS. We are committed to protecting the information we collect. We have put in place appropriate technical and organisational measures to protect the information you provide or we collect against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use. We use SSL encryption on our websites via which we collect personal information. We do not sell your personal information for any purpose.

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All of our employees and data processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to and are associated with the processing of personal information, are obliged to respect the confidentiality of the personal information of all users of our services.

How to access your information and your other rights

This policy outlines the rights that data subjects have, under EU (GDPR) & UK Data Protection Laws in relation to the data about them that we hold.

The Right to be Informed: Our Privacy Notices set out;

- the types of data we hold and the reason for processing the data;
- our legal basis for processing it;
- details of who your data is disclosed to and why, including transfers to other countries. Where data is transferred to other countries, the safeguards used to keep your data secure are explained;
- how long we keep your data for, or how we determine how long to keep your data for;
- where your data comes from;
- your rights as a data subject;
- your absolute right to withdraw consent for processing data where consent has been provided and no other lawful reason for processing your data applies;
- your right to make a complaint to the Information Commissioner if you think your rights have been breached
- whether we use automated decision making and if so, how the decisions are made, what this means for you and what could happen as a result of the process;
- the name and contact details of our Privacy Officer.

The Right of Access: You have the right to access your personal data which is held by us. You can find out more about how to request access to your data by reading our Subject Access Request policy.


The Right of Correction: If you discover that the data we hold about you is incorrect or incomplete, you have the right to have the data corrected. If you wish to have your data corrected, you should contact our Privacy Officer at gdpr@pds-comms.co.uk.

Usually, we will comply with a request to rectify data within 30 days unless the request is particularly complex in which case we may write to you to inform you we require an extension to the normal timescale. The maximum extension period is two months.

You will be informed if we decide not to take any action as a result of the request. In these circumstances, you are able to complain to the Information Commissioner and have access to a judicial remedy. Third-parties to whom the data was disclosed will be informed of the rectification.

The Right of Erasure: In certain circumstances, we are required to delete the data we hold on you. Those circumstances are:

- where it is no longer necessary for us to keep the data;
- where we relied on your consent to process the data and you subsequently withdraw that consent. Where this happens, we will consider whether another legal basis applies to our continued use of your data;
- where you object to the processing (see below) and the Company has no overriding legitimate interest to continue the processing;
- where we have unlawfully processed your data;
- where we are required by law to erase the data.

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If you wish to make a request for data deletion, you should contact our Privacy Officer at gdpr@pds-comms.co.uk. We will consider each request individually, however, you must be aware that processing may continue under one of the permissible reasons. Where this happens, you will be informed of the continued use of your data and the reason for this.

Third-parties to whom the data was disclosed will be informed of the erasure where possible unless to do so will cause a disproportionate effect on us.

The Right of Restriction: You have the right to restrict the processing of your data in certain circumstances. We will be required to restrict the processing of your personal data in the following circumstances:

- where you tell us that the data it holds on you is not accurate. Where this is the case, we will stop processing the data until it has taken steps to ensure that the data is accurate;
- where the data is processed for the performance of a public interest task or because of our legitimate interests and you have objected to the processing of data. In these circumstances, the processing may be restricted whilst we consider whether our legitimate interests mean it is appropriate to continue to process it;
- when the data has been processed unlawfully;
- where we no longer need to process the data but you need the data in relation to a legal claim.

If you wish to make a request for data restriction, you should contact our Privacy Officer at gdpr@pds-comms.co.uk. Where data processing is restricted, we will continue to hold the data but will not process it unless you consent to the processing or processing is required in relation to a legal claim.

Where the data to be restricted has been shared with third-parties, we will inform those third-parties of the restriction where possible unless to do so will cause a disproportionate effect on us. You will be informed before any restriction is lifted.


The Right to Data Portability: You have the right to obtain the data that we process on you and transfer it to another party. Where our technology permits, we will transfer the data directly to the other party. Data which may be transferred is data which:

- you have provided to us; and
- is processed because you have provided your consent or because it is needed to perform the employment contract between us; and
- is processed by automated means.

If you wish to exercise this right, please speak to our Privacy Officer at gdpr-comms.co.uk. We will respond to a portability request without undue delay and within 30 days at the latest unless the request is complex or we receive a number of requests in which case we may write to you to inform you that we require an extension and reasons for this. The maximum extension period is two months. We will not charge you for access to your data for this purpose. We will provide any data as a .csv file.

You will be informed if we decide not to take any action as a result of the request, for example, because the data you wish to transfer does not meet the above criteria. In these circumstances, you are able to complain to the Information Commissioner and have access to a judicial remedy.

The right to data portability relates only to data defined as above. You should be aware that this differs from the data which is accessible via a Subject Access Request.

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The Right to Object: You have a right to require us to stop processing your data; this is known as data objection. You may object to processing where it is carried out:

- in relation to the Company's legitimate interests;
- for the performance of a task in the public interest;
- in the exercise of official authority; or
- for profiling purposes.

In some circumstances we will continue to process the data you have objected to. This may occur when:

- we can demonstrate compelling legitimate reasons for the processing which are believed to be more important than your rights; or
- the processing is required in relation to legal claims made by, or against, us.
- If the response to your request is that we will take no action, you will be informed of the reasons.

The Right not to have automated decisions made about you: You have the right not to have decisions made about you solely on the basis of automated decision-making processes where there is no human intervention, where such decisions will have a significant effect on you. However, the Company does not make any decisions based on such processes.

COOKIE POLICY

Our website uses cookies. By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

About Cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.


Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identified a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

Cookies can be used by web servers to identify and track users as they navigate different pages on a website and identify users returning to a website. You can find more information about cookies from these websites;

- www.allaboutcookies.org
- www.aboutcookies.org
- www.youronlinechoices.eu

Internet cookies can save data about individual users, such as your name, password, user-name, screen preferences, the pages of a site viewed by you and the advertisements viewed or clicked by

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you. When you revisit the website, PDS may recognise you by the Internet cookie and customise your experience accordingly.

You may decline Internet cookies, if any, by using the appropriate feature of their Web client software, if available. However, declining to use cookies may impede the ability of the website to function properly. When you perform a search within the website, PDS may record information identifying you or linking you to the search performed. PDS may also record limited information associated with every search request made by you and use that information to, among other things, solve technical problems with the service and to calculate overall usage statistics.

Our Cookies

We use both session and persistent cookies on our website.

Analytics Cookies

We use (Google Analytics) to analyse the use of our website. Our Analytics service provider generates statistical and other information about website use by means of cookies. The names of the cookies that we use on our website and the purposes for which are used, are set out below;


- NID=Google Preference cookie. The NID cookie contains a Unique ID Google uses to remember your preferences and other information such as your preferred language (*persistent cookie*) (*third party*)
- PHPSESSID=The first time a PHP script calls a session start(), a session identifier is generated. The response sets up a session cookie in the browser (*session cookie*) (*own cookie*)
- _drip_client_6994213=Remember previous actions when browsing a page during the same session (*session cookie*)
- _ga=Google Universal Analytics (*persistent cookie*) (*third party cookie*)
- _gat_gtag_UA_57608198_13=Google Universal Analytics (*session cookie*) (*third party cookie*)
- _gid=Google Universal Analytics (*session cookie*) (*third party cookie*)
- tk_tc=wp.com (wordpress.com)=This cookie collects metrics about the users use of the website in relation to wordpress.com so that wordpress.com can improve its services (*session cookie*) (*third party cookie*)
- et-pb-recent-items-font family=Elegant Themes cookie-this is the company that provides the theme for PDS-comms = (*persistent cookie*) (*third party cookie*)
- wfvt_3934014054 = Wordfence Cookie-verifies this is a person not a bot cookie (*session cookie*) (*own cookie*)
- wordfence_verifiedHuman=Wordfence Cookie-used to protect the site (*session cookie*) (*own cookie*)
- wordpress_test_cookie=Wordpress cookie used to check whether your web browser is set to allow or reject cookies (*session cookie*) (*own cookie*)

How to delete and manage cookies

Applies to: Internet Explorer Windows 10 Windows 8.1 Windows 7

[To delete cookies](#)

1. In Internet Explorer, select the **Tools** button, point to **Safety** and then select **Delete browsing history**
2. Select the **Cookies and website data** check box and then select **Delete**

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[To delete cookies in Internet Explorer 8](#)

1. In Internet Explorer, select the **Safety** button and then select **Delete Browsing History**
2. Select the check box next to **Cookies**
3. Select the **Preserve Favourites website data** check box if you don't want to delete the cookies associated with websites in your **Favourites** list
4. Select **Delete**

Block or allow cookies

If you don't want sites to store cookies on your PC, you can block cookies. But blocking cookies might prevent some pages from displaying correctly, or you might get a message from a site letting you know that you need to allow cookies to view that site.

[To block or allow cookies in Internet Explorer 11 for Windows 10](#)

1. In Internet Explorer, select the **Tools** button, and then select **Internet options**
2. Select the **Privacy** tab and under **Settings**, select **Advanced** and choose if you want to allow, block or be prompted for first and third-party cookies

[To block or allow cookies](#)

1. In Internet Explorer, select the **Tools** button and then select **Internet options**
2. Select the **Privacy** tab and under **Settings**, move the slider to the top to block all cookies (or the bottom to allow all cookies), and then select **OK**

Third-Party Websites

Our website contains links to websites managed by third-parties. We do not know what cookies those other websites use. Please check the cookie policy of those third-party websites if you would like to know more.

UPDATES TO OUR PRIVACY & COOKIE POLICY

To ensure that you are always aware of how we use your personal information we will update this policy from time to time to reflect any changes or if we introduce new cookies or change the way we use the cookies described above. We may also make changes as required to comply with changes in applicable law or regulatory requirements. We will notify you by email of any significant changes. However, we encourage you to review this policy periodically to be informed of how we use your personal information.

Privacy Officer

PDS Communications Limited

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