# 1.0 Privacy Policy

This Privacy Statement regulates the use by Compio Limited ("Compio", "Our", "Us", "We") of "personal data" that a Data Subject ("You") provide to Compio prudent to obtaining products or services from Compio or its business partners ("Vendors"). Personal data is information which relates to an individual and from which they can be identified directly or indirectly through other data in possession.

Compio processes personal data in accordance with applicable Data Protection legislation, Data Protection Act 1998 up to the 24th May 2018; and with effect from 25th May 2018 the General Data Protection Regulations 2018, (collectively "Data Protection Laws"). For queries concerning data protection matters at Compio, please contact Compio Compliance Officer at the address featured at the bottom of this page.

#### Personal Data

We will not collect any personal data about you or your members of your workforce, except where it is specifically and knowingly provided ("Consented") or where it is necessary for Compio to process or hold for the purposes of supplying goods or services to you, or the organisation you represent, where such goods or services are supplied by Compio or its Vendors; or where there is a valid legal basis. Examples of personal data that you may provide to us include, but may not be limited to:

Addresses, email addresses Names Role / occupation information Telephone numbers

### Goods or services provided by Vendors

If the information that you provide to Compio is for purposes of our vendors providing a service to you, then you consent to Compio in providing the relevant vendor with that information. The use of that information may be set out in the relevant vendor's Privacy Statement. Such vendors include, but may not be limited to Microsoft®. A copy of the relevant Microsoft Privacy Statement may be found here. The Privacy Statements of other vendors may be described in the Compio General Terms & Conditions; relevant Compio Product Terms; or set out on the relevant vendor website.

## Where we store your personal data

Compio may process and store personal data, that you provide to us, on our internal and external third party hosted systems. Personal data that you provide to us shall be stored on systems with technical and organisational security measures and controls that strengthen data security. We will only store personal data for as long as necessary for Compio to process such

personal data, or for as long as required prudent to applicable records retention obligations. If the personal information you provide is inaccurate or becomes out of date, then you must inform us and we will update our records.

#### Uses made of the Personal Data

We use personal data held about you as follows: to enable Compio to hold appropriate contact information for the goods or services we provide to you or the organisation you represent.

## Automated decision-making

Unless otherwise agreed with you, we will not use any of your personal data for automated decision-making or profiling.

## Disclosure of your Information

We will not disclose your information to anyone outside of Compio unless required or permitted by law, or where we have your consent to do so. The transmission of information via internet, by any means, may not be secure. Any such transmission by you is at your own risk.

## Legal Basis for Processing

Data Protection Laws require that we meet certain conditions before we may use your personal data as described in this Privacy Policy Statement. For personal data which is not 'sensitive data' or 'special categories of personal data' under Data Protection Laws, unless otherwise notified, we rely on conditions known as "specified, explicit and legitimate purposes" and "legitimate interests" in order to process your personal data for the above specified purposes. For example, it is in our legitimate interests to process your personal data in relation to the fulfil the delivery of goods or services; or in response to an enquiry; or in accordance to your Preferences; and in order for us to meet legal obligations under relevant Data Protection laws and other applicable laws, including but not limited those prudent to Records Retention obligations. We will keep the amount of data collected, and the extent of any processing, to a minimum to meet these legitimate interests.

# Your rights in relation to your personal data

Under Data Protection Laws you have the following rights in relation to your personal data: right to access your personal data by means of a subject access request; and the right to have your personal data rectified if it is inaccurate/incomplete. From 25th May 2018 you will also have the right to: have data erased; to object to direct marketing; to not be subjected to automated decision making (including profiling) where such produces a legal effect or significant effect on you; and you have the right to bring a civil action if your data subject rights have been breached.

## Complaints

If you are not happy with the way in which your personal data is held or processed by us then we request that you notify our compliance Officer, at the contact details set out below, so that we may address your concerns swiftly. You have the right to raise a complaint with the ICO directly.

#### Cookie law

This Privacy Policy Statement does not include a description of, nor does it supersede lawful provisions set out in applicable Cookie laws. Compio's implementation of Cookie law is set out on our Cookie page here.

# Changes to this Privacy Statement

Please note that this Privacy Policy Statement may be amended in future to reflect any changes in Data Protection laws, our services, or our organisation.

## 2.0 Unsolicited Emails/Spam

Compio limits the number of emails sent to contacts and the subject of such emails will always relate to the products and services that we provide. It is not our intention to bombard our customers, or prospective customers, with unsolicited mail and we will remove contact details when requested to do so.

## **Customer contacts**

Your details are on Compio's database because your organisation receives goods and/or services from us. We believe that the emails will contain useful information that is relevant to you in your professional capacity. If you do not wish to receive emails of this nature, please let us know by emailing <a href="mailto:Sales@Compio.co.uk">Sales@Compio.co.uk</a> or via the preferences link in our marketing communication.

#### Other contacts

If you are not an Compio client your details will be included on our database for one of the following reasons:

Vendor lead. You have enquired about a specific product via a manufacturer and they have passed your details to us in order that your enquiry may be followed up.

Event registration/attendance. You have provided your details when registering for one of Compio's seminars, or you have provided your details when visiting Compio at a conference/exhibition.

Third party database. Compio occasionally purchases lists of IT contacts from an approved data

supplier. The data supplier only passes on the details of recipients who have consented to their details being passed on to technology service businesses, such as Compio. You passed on your contact details at a Sales or Networking Event.

If you do not wish to continue to receive emails relating to Compio's IT services, please let us know by emailing <a href="mails:Sales@compio.co.uk">Sales@compio.co.uk</a> or update your marketing preference via the link in our Marketing Emails. Compio does not knowingly get involved in "spamming" activities of any kind and we work only with business partners who we believe have similar anti-spamming policies.

### 3.0 Email Communications Preferences

You can update your communication preferences at any time via the link in the email for Marketing preferences.

### 4.0 Opt-out

Compio will always provide recipients with an opportunity to opt-out or 'unsubscribe' from receiving further email content. This is because we only want to send information to people who are interested in receiving it. Compio is responsible for responding to 'opt-out' or 'unsubscribe' requests when requested to do so. In turn, our business partners are responsible for complying with all such requests by removing the appropriate person from their lists.

# 5.0 Contact our Nominated point of contact

Compliance Officer Compio Limited 72a High Street Battle TN33 0AG

Or Compliance@Compio.co.uk