

[Issue 2]

Privacy Policy

Contents

| Clause | Subject | Page |
|--------|--|------|
| 1. | Introduction and terms | 2 |
| 2. | Who we are and how to contact us | 2 |
| 3. | Your rights | 2 |
| 4. | The data we collect about you | 2 |
| 5. | How your data will be used | 2 |
| 6. | Legitimate interest & marketing. | 2 |
| 7. | Applications to work for us | 3 |
| 8. | Data retention | 3 |
| 9. | Data deletion | 3 |
| 10. | Data correction. | 3 |
| 11. | Data inspection. | 3 |
| 12. | Changes | 3 |
| 13. | Complaints | 3 |

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DATE: 02/05/18

DOCUMENT APPROVED BY:



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DATE: 02/05/18

1. INTRODUCTION AND TERMS

Silvalea Limited ("We" or "us") are committed to protecting and respecting your personal data and privacy. This privacy policy relates to our use of any personal data we collect from you from any of our services. Whenever you provide such information, we are legally obliged to use your information in line with all applicable laws concerning the protection of personal data; including the Data Protection Act 1998 (DPA) and The General Data Protection Regulation 2016 (GDPR) together, and with other subsequent laws "Data Protection Laws".

2. WHO WE ARE AND HOW TO CONTACT US

- 2.1. For the purpose of the Data Protection Laws, the data controller is Silvalea Limited, registered company number 4350939. If you want to request more information about our privacy policy or information regarding data protection you should contact us using the details provided below:

FAO: Privacy Officer
 Silvalea Limited
 Units 1-4 Silverhills Building
 Silverhills Road
 Decoy Industrial Estate
 Newton Abbot
 Devon
 TQ12 5LZ
 Email: helpdesk@silvalea.com
 Telephone: 01626 331 655 and ask to speak to the Privacy Officer

3. YOUR RIGHTS

Under the Data Protection Laws your rights are:

- 3.1. To be informed – We must make available this privacy notice with the emphasis on transparency over how we process your data.
- 3.2. Access – You are entitled to find out what details we may hold about you and why.
- 3.3. Rectification – We are obliged to correct or update your details.
- 3.4. Erasure – This is also known as the request to be forgotten.
- 3.5. Restrict processing – You have the right to 'block' or suppress the processing by us of your personal data.
- 3.6. Data portability – You have the right to obtain and reuse your personal data that you have provided to us.
- 3.7. Object – You have the right to object to us processing your data in relation to direct marketing and or profiling.
- 3.8. Rights in relation to automated decision making and profiling – We do not use automatic decision making or processing.

4. THE DATA WE COLLECT ABOUT YOU

- 4.1. We process Personal data. Personal data we process may include name, address and email address. It also may include IP address and cookies (Website).
- 4.2. Our collection methods are:
 - 4.2.1. through our website;
 - 4.2.2. through engagement of our services;
 - 4.2.3. by communications;
 - 4.2.4. networking; and/or
 - 4.2.5. through engagement of service providers.

5. HOW YOUR DATA WILL BE USED

- 5.1. We use information held about you to:
 - 5.1.1. ensure that content from our site is presented in the most effective manner for you and for your devices;
 - 5.1.2. provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes or by Legitimate Interests;
 - 5.1.3. carry out our obligations arising from any contracts entered into between you and us;
 - 5.1.4. allow you to participate in interactive features of our service when you choose to do so, e.g. asking a question through our website.
 - 5.1.5. carry out necessary maintenance to our infrastructure; and
 - 5.1.6. notify you about changes to our services
- 5.2. We also embrace the use of social media and may wish to process any comments made public by you.

6. LEGITIMATE INTEREST & MARKETING

- 6.1. Where we use Legitimate Interests, we will record our decision and our method on making this decision. This can be requested by you at any time.
- 6.2. If you are an existing contact or customer, we will only contact you by postal and electronic means (e-mail) with information about services or goods which you have previously purchased from us or enquired about. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by post or electronic means only if you have consented to this. You can choose to not receive these types of communication by contacting us.

THIRD PARTIES

- 6.3. We will keep your information within the 'organisation' except where disclosure is required or permitted by law or when we use third party service providers (data processors) to supply and support our services to you. We have contracts in place with our data processors. This means that they cannot do anything with your personal data unless we have instructed them to do so. They will not share your personal data with any organisation apart from us. They will hold it securely and retain it for the period we instruct.
- 6.4. Please see below the list of services where we use third party data processors which sets out the categories of recipients of personal data.

| SERVICE PROVIDED | PROVIDED BY |
|--|-------------------------------------|
| IT Provider – Cloud Service – IT Support | Timewade |
| Email Provider | Office 365/Microsoft |
| Secure document disposal service | Devon Contract Waste |
| Storage Facility | Datto Backup Solutions |
| Accountants | Internal – Audited by Francis Clark |

7. APPLICATIONS TO WORK FOR US

If you apply to work for us (directly or indirectly) in any role (including volunteers) we may receive data about you from third parties. In addition, we will keep the details of your application and any additional information provided to us by you or others during your application so that we can keep you informed of future opportunities that you may be interested in. If you do not wish for us to keep your details for this reason, please let us know by contacting us using the details provided in this policy.

8. DATA RETENTION

Our data retention policy is dictated by the Data Protection Laws and is available for inspection by submitting a written request using the contact details provided in this policy.

9. DATA DELETION

Under Data Protection Laws you have the right to erasure under specific circumstances. A request for your personal data to be deleted will be decided on a case by case basis and must be submitted in writing to the contact details provided in this policy.

10. DATA CORRECTION

We will correct or update your data without delay provided you make the request in writing to the contact details provided in this policy, clearly specifying which data is incorrect or out of date.

11. DATA INSPECTION

- 11.1. We strive to be as open as we can be in terms of giving people access to their personal data. Individuals can find out if we hold any of their personal data by making a formal request under the Data Protection Laws. Such requests must be in writing to the contact details provided in this policy. If we do hold your personal data, we will respond in writing within one calendar month of your request (where that request was submitted in accordance with this policy).
- 11.2. The information we supply will:
- 11.2.1. confirm that your data is being processed;
 - 11.2.2. verify the lawfulness and the purpose of the processing;
 - 11.2.3. confirm the categories of personal data being processed;
 - 11.2.4. confirm the type of recipient to whom the personal data have been or will be disclosed; and
 - 11.2.5. let you have a copy of the data in an intelligible form.
- 11.3. Please note that you may need to provide identification to prove who you are to access your data.
- 11.4. If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.
- 11.5. In the instance that we do not hold information about you we will also confirm this in writing at the earliest opportunity.

12. CHANGES

We keep our privacy notice under regular review and you should check back regularly to ensure you are aware of changes to it. We may display this notice to you from time to time to help ensure you are aware of its contents.

13. COMPLAINTS

You have the right to complain about the processing of your personal data. Please contact us using the details provided above. If you are still unsatisfied you have the right to complain to the Information Commissioners Office.