

## **NSR Privacy Policy 2019**

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### **Introduction**

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data, and keep it safe.

We know that there's a lot of information here, but we want you to be fully informed about your rights, and how NSR Management Ltd use your data.

We hope the following sections will answer any questions you have but if not, please do get in touch with us.

It's likely that we'll need to update this Privacy Notice from time to time. We'll notify you of any significant changes, but you're welcome to come back and check it whenever you wish. When you are using NSR's Management's Website, NSR Management Ltd is the data controller. For simplicity throughout this notice, 'we' and 'us' means NSR Management Ltd.

### **Who are NSR Management Ltd**

NSR Management is a niche company which was founded in 1982. We publish and sell the National Schedule of Rates and supply a data format version which is compatible with our bespoke pricing, contracting and invoicing software.

Our trusted name comes from some of the foundational values of the business which include transparency and accountability. We are based in Aylesbury and have a team who are highly focused on customer service. We pride ourselves on delivery through to after sales care and support.

### **An explanation of the legal basis we rely on**

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

#### **Consent**

In specific situations, we can collect and process your data with your consent. For example when you tick a box to receive email newsletters. When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service.

#### **Contractual obligations**

In certain circumstances, we need your personal data to comply with our contractual obligations. For example, if you order an item from us for delivery, we'll collect your address details to deliver your purchase, and pass them to our courier. Likewise if you register for data or software we need to share your details with DCSL who manage our server and software programme.

## **Legal compliance**

If the law requires us to, we may need to collect and process your data. For example, we can pass on details of people involved in fraud or other criminal activity to law enforcement.

## **Legitimate interest**

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. For example, we will use your purchase history to send you amendments or new product information. We also combine the shopping history of many customers to identify trends and ensure we can keep up with demand, or introduce new products/services.

We will also use your address details to send you direct marketing information by post, telling you about products and services that we think might interest you.

## **When do we collect your personal data?**

- When you create an account with us.
- When use your account to buy products by visiting our website, or over the phone.
- When you engage with us on social media.
- When you contact us by any means with queries
- When you comment on or review our products and services.
- Any individual may access personal data related to them, including opinions. So, if your comment or review includes information about companies we work in conjunction with who provided that service, it may be passed on to them if requested.
- When you've given a third party permission to share with us the information they hold about you.
- When you use our car park this has CCTV systems operated for the security of visiting clients and employees to prevent crime. These systems may record your image during your visit.

## **What sort of personal data do we collect?**

- If you have an account with us: your name, business name, business type, billing/delivery address, orders and receipts, email and contact telephone numbers. If you have a website account then for your security, we'll also keep an encrypted record of your login password.
- Details of your interactions with us through our office or online - For example, we collect notes from our conversations with you, to assist our frequently asked questions, details of purchases.
- Details of your visits to our website via Google Analytics.
- Payment card information.
- Your image may be recorded on CCTV when you visit our office car park.
- Your car number plate may be recorded at our car park to manage parking restrictions.
- To deliver the best possible web experience, we collect technical information about your internet connection and browser as well as the country and telephone code where your computer is located, the web pages viewed during your visit, the advertisements you clicked on, and any search terms you entered.
- Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback. We also collect cookies on our website.
- If you purchase certain products you would have consented to a data capture which gives us your IP address and computer user name.
- When you contact us by telephone we record the calls manually.

## **How and why do we use your personal data?**

We want to give you the best possible customer experience. One way to achieve that is to get the richest picture we can of who you are by combining the data we have about you. We then use this to share newsletters and information of new product releases or updates. The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service.

Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for. For example, without data capture completed we would be unable to supply certain products.

### **Here's how NSR will use your personal data and why:**

- To process any orders that you make by using our website, or over the phone. If we don't collect your personal data during checkout, we won't be able to process your order and comply with our legal obligations - For example, your details may need to be passed to a third party to supply or deliver the product or service that you ordered, and we may keep your details for a reasonable period afterwards in order to fulfil any contractual obligations such as refunds, guarantees and so on.
- We will use your data collected in checkout to set up viewing accounts for you to access your products on line.
- To respond to your queries. Handling the information you sent enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.
- To protect our business and your account from fraud and other illegal activities. This includes using your personal data to maintain, update and safeguard your account. We'll also monitor your browsing activity with us to quickly identify and resolve any problems and protect the integrity of our website. We'll do all of this as part of our legitimate interest - For example, by checking your password when you login and using automated monitoring of IP addresses to identify possible fraudulent log-ins from unexpected locations.
- To protect our visitors and employees, premises and assets from crime, we operate CCTV systems in our carpark which record images for security. We do this on the basis of our legitimate business interests.
- To process payments and to prevent fraudulent transactions. We do this on the basis of our legitimate business interests. This also helps to protect our customers from fraud.
- If we discover any criminal activity or alleged criminal activity through our use of CCTV, fraud monitoring and suspicious transaction monitoring, we will process this data for the purposes of preventing or detecting unlawful acts. Our aim is to protect the individuals we interact with from criminal activities.
- To send you relevant, personalised communications by post in relation to system updates, services and new products. We'll do this on the basis of our legitimate business interest - You are free to opt out of hearing from us by post at any time.
- To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Privacy Notice, product amendments, and legally required information relating to your orders. These service messages will not include any promotional content and do not require prior consent when sent by email or text message. If we do not use your personal data for these purposes, we would be unable to comply with our legal obligations.
- To comply with our contractual or legal obligations to share data with law enforcement - For example, when a court order is submitted to share data with law enforcement agencies or a court of law.
- To contact you for your feedback helps us improve our services. These calls or emails have no purpose other than to check your service. We have a legitimate interest to do so as this helps us ensure you have access to your product and are able to view it. Of course, you are free to opt out of receiving these calls or emails from us at any time by contacting us via email, telephone or adjusting your profile online.

### **How we protect your personal data**

We know how much data security matters to all our clients. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it. We secure access to all transactional areas of our website using 'https' sage technology (Sage hold their own payment policy) Access to

your personal data is password-protected, and sensitive data such as payment card information is through a secured server to ensure it is protected.

We regularly monitor our system for possible vulnerabilities and attacks.

### **How long will we keep your personal data?**

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected. For example, when you place an order, we'll keep the personal data you give us for seven years so we can comply with our legal and contractual obligations.

At the end of that retention period, your data will either be deleted.

### **Who do we share your personal data with?**

We sometimes share your personal data with trusted third parties. For example, delivery couriers, software managers, networking team and our web managers.

### **Here's the policy we apply to those organisations to keep your data safe and protect your privacy:**

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify in our contract with them.
- We work closely with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

### **Examples of the kind of third parties we work with are:**

- IT companies who support our website and other business systems.
- Operational companies such as delivery couriers.
- Direct marketing companies who help us manage our electronic communications with you.
- Google/Facebook.

### **Sharing your data with third parties for their own purposes:**

We will only do this in very specific circumstances, for example:

- For fraud management, we may share information about fraudulent or potentially fraudulent activity with or systems or licences. This may include sharing data about individuals with law enforcement bodies.
- We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.
- We may expand, reduce or sell the business this may involve the transfer of divisions or the whole business to new owners. If this happens, your personal data will, where relevant, be transferred to the new owner or controlling party, under the terms of this Privacy Notice.
- For further information please contact our Data Controller.
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### **To help personalise your journey through with us we currently use the following companies, who will process your personal data as part of their contracts with us:**

- Courier – DPD
- Payment Providers – SagePay
- DCSL to assist our Software

- Google
- Social Media – Facebook, Twitter, Instagram, Pinterest
- Fresh Printing – Mail outs
- Actopia – IT Support
- Yostrato & Jetfruit – Web Developers

### **Where your personal data may be processed**

Currently we not work outside of UK but if we did, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the EEA. For example, our contracts with third parties stipulate the standards they must follow at all times. If you wish for more information about these contracts please contact our Data Controller.

Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Privacy Notice.

### **What are your rights over your personal data?**

An overview of your different rights you have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.
- The correction of your personal data when incorrect, out of date or incomplete.
- When you withdraw consent, or object and we have no legitimate overriding interest, or once the purpose for which we hold the data has come to an end.
- That we stop using your personal data for direct marketing.
- That we stop any consent-based processing of your personal data after you withdraw that consent.

You have the right to request a copy of any information about you that NSR Management Ltd holds at any time, and also to have that information corrected if it is inaccurate. To ask for your information, please contact Data Controller, NSR Management Ltd, Ardenham Court, Oxford Road, HP19 8HT. To ask for your information to be amended, update your online account personally online or contact us in the office.

If we choose not to action your request we will explain to you the reasons for our refusal.

### **Your right to withdraw consent**

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

### **Where we rely on our legitimate interest**

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

### **Direct marketing**

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

### **Checking your identity**

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

### **How you can stop the use of your personal data for direct marketing**

There are several ways you can stop direct marketing communications from us:

- Click the 'unsubscribe' link in any marketing email communication that we send you.
- If you have an online account, log in, visit the 'My Account' area and change your Communication Preferences.
- Contact our office on Telephone: 01296 339966 or email: [info@nsrmanagement.co.uk](mailto:info@nsrmanagement.co.uk)
- Write to Data Controller, NSR Management Ltd, Ardenham Court, Oxford Road, HP19 8HT

**Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.**

### **Contacting the Regulator**

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling [0303 123 1113](tel:03031231113) or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) (opens in a new window; please note we can't be responsible for the content of external websites)

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence. Details can be found in Section 16.

### **If you are based outside of the UK**

For all non-UK customers

By using our services or providing your personal data to us, you expressly consent to the processing of your personal data by us or on our behalf. Of course, you still have the right to ask us not to process your data in certain ways, and if you do so, we will respect your wishes.

### **Any questions?**

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it. If you have any questions that haven't been covered, please contact our Data Protection Officer who will be pleased to help you:

This notice was last updated on 14/01/2019