

DATA PROTECTION & PRIVACY POLICY

OT Experts fully accepts that the protection of personal data is essential. We process personal data in line with the General Data Protection Regulation (GDPR). This policy sets out how we will use any personal data we collect from the Data Subject, or that the Data Subject provides to us. Please read the following carefully to understand how we use personal data. Personal data is any information that relates to the Data Subject from which we can identify the Data Subject.

DEFINITIONS

In this document the Data Subject may find the following terms:

Computer - By this, we mean whatever digital device the Data Subject use to access the internet and to visit OT Experts' website.

Consent - Your Consent is your agreement to allow us to process your personal data; it must be freely given, informed and specific to the purpose for which it is required. You can withdraw that agreement at any time.

Data Controller or controller responsible for the processing - The Data Controller is responsible for determining what personal data is collected, what reasons it is required and how it is processed (which includes how it is stored and to whom and how it is transmitted). This includes occasions when data is collected or processed on behalf of the Data Controller by a third party.

Data Processor - The Data Processor is an individual or organisation which processes (as defined above) personal data on behalf of the Data Controller.

Data Subject - An individual whose data/information is being processed.

Personal Data - Personal data means any information relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier (e.g. IP Address) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

Processing - By processing we mean the collection, recording, organisation, structuring, storage, alteration, retrieval, use, disclosure (by transmission, or otherwise making available), erasure or destruction of personal data.

NAME AND ADDRESS OF THE DATA CONTROLLER

Address and contact details are as follows:

1. Kate Makin
2. The Data Controller
3. Address: PO Box 402, Newcastle, NE3 2PU
4. Phone: 0800 975 0369
5. Email: kate.makin@otexperts.co.uk
6. Website: www.otexperts.co.uk

DATA COLLECTION

We routinely seek, receive and process personal data to provide our services. We also collect and handle personal data about visitors to our website, including:

1. Information that the Data Subject provides by filling in forms on our websites and information provided by the Data Subject at the time of purchasing any products or services, registering for any of our events or if the Data Subject requests further information about us or anything we do. We may also ask the Data Subject for information for other purposes, for example when the Data Subject reports a problem.
2. For any financial transactions, we collect the following information about the Data Subject: your name, your contact details, your bank account details (OT Experts does not have access to or retains credit/debit card details) and a record of your interactions with OT Experts, such as correspondence about your payment(s).
3. Information about the computer accessing our website and about visits to and use of this website (including the computer's IP address, geographical location, browser type, referral source, length of visit and number of page views).
4. Information provided to us to subscribe to our website services, email notifications and newsletters, including email address and name.
5. We may also ask the Data Subject to complete surveys that we use for research purposes, although the Data Subject does not have to respond to them.
6. If the Data Subject contacts us, we may keep a record of that correspondence.
7. Any other information that the visitor chooses to send to us.

Our website may contain links to other sites. We are not responsible for the privacy policies or practices of third party websites.

WHERE WE STORE YOUR PERSONAL DATA

Documentation supporting client's services, event/training bookings and delivery of our services is stored on our own secure storage platform. The Data Protection Officer carries out periodic backups of databases, these backups are held on our own air-gapped secure storage platform. OT Experts does not keep any hardcopy application/registration documents, all documents received in hardcopy are scanned and then shredded, with a digital copy stored on our own server and the designated storage platform as appropriate. When circumstances and administrative requirements require it, copies of digital records may be downloaded to local devices to enable processing and data interrogation. We do not share personal data.

USING PERSONAL DATA

We use personal data submitted to us for our legitimate business purposes, which include:

1. Providing a service for or on behalf of the Data Subject;
2. Managing our website to improve its functionality and the Data Subject's browsing experience;
3. Providing statements, reports, correspondence, invoices and collecting payments;
4. Non-marketing communications with the Data Subject;
5. Marketing communications (e.g. newsletters) relating to our business which we think may be of interest to the Data Subject. Where this is by email, we include the option to unsubscribe from future marketing communications.

We do not use your data to make automated decisions.

SECURITY OF PERSONAL DATA IN TRANSMISSION

Unfortunately, the transmission of information via the internet is not entirely secure. Although we will do what can reasonably be expected to protect personal data, we cannot guarantee the security of data transmitted through our websites and any such transmission is at your own risk. Upon receipt of personal data/information, we will use appropriate procedures and standard security features to protect your personal data against unauthorised or unlawful access or accidental loss, destruction or damage. All personal data received by OT Experts is subject to appropriate electronic and physical security measures including, electronic and physical access restrictions, defined retention periods and secure destruction policies.

DATA RETENTION/DESTRUCTION

We process and store personal data only for the period necessary to achieve the purpose of storage. Our policy for data retention is intended to protect individual interests and the interests of the public. Information held about a legal case has the potential to be of value in future proceedings (e.g. appeal), even if this is not immediately obvious. We, therefore, hold case data for up to 30 years depending on the type of case, although we will destroy it within 18 months if it has not contributed to any service we have provided.

We will hold your contact details in case we need to get in touch regarding one of your cases or a service/update which we think may interest the Data Subject.

Where we identify that it is no longer necessary for us to hold personal data, we shall delete it or anonymise it such that it is no longer personal in accordance with our company policies and legal requirements.

DATA PROTECTION AND GOOGLE ANALYTICS AND GOOGLE ADWORDS

OT Experts may employ both the Analytics and AdWords services provided by Google. Google Analytics is a web analytics service that collects data about the website from which a person has come, which pages on our site were visited, and how often and for how long a page was viewed. Google AdWords is a service for internet advertising that allows OT Experts to place ads in Google search engine results and the Google advertising network which is designed to promote our service and encourage people to visit our website.

Google uses the data to evaluate the use of our website and to carry out analysis of our Internet advertising. Google stores personal data outside of the EU in the United States of America and Google may pass this data on to other third parties. Google provides detailed instructions on how to block cookies at <https://support.google.com/accounts/answer/61416>

Google's privacy policy is located here: <https://www.google.co.uk/policies/privacy>

LEGAL BASIS FOR PROCESSING

Article. 6(1) lit. (a) GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose.

If the processing of personal data is necessary for the performance of a contract to which the Data Subject is a party, as is the case, for example, for the supply of our consultancy services, the processing is based on **Article 6(1) lit. (b) GDPR**. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of enquiries concerning our products or services.

Where OT Experts is subject to a legal obligation by which processing of personal data is required, such as for the maintenance of accounting records and the fulfilment of tax obligations, the processing is based on **Art. 6(1) lit. (c) GDPR**.

If the Data Subject is a litigant or witness in a case in which OT Experts is, or maybe, instructed, OT Experts has a legal basis for processing the Data Subject's personal and case-related data pursuant to **Article 6(1) lit. (e) GDPR** in the public interest.

By choosing to share with us case-related information associated with a service we are providing, the Data Subject and/or the Data Controller of that data accepts that there is a legitimate interest in our processing the data under **Article 6(1) lit. (f) GDPR**. The contact details supplied to us may also be used for marketing purposes under the same premise.

DISCLOSURES

OT Experts may disclose personal data to any of our consultants, instructing parties, suppliers or subcontractors insofar as reasonably necessary for us to provide our services and for the purposes as set out in this Data Protection and Privacy Policy. In addition, we may disclose information:

1. To the extent that we are required to do so by law;
2. In connection with any legal proceedings or prospective legal proceedings;
3. To establish, exercise or defend our legal rights (including providing information to others for fraud prevention and reducing credit risk); and
4. To the purchaser (or prospective purchaser) of any business or asset which we are (or are contemplating) selling.

Otherwise where personal data, other than those necessarily recorded by website analytical software for the purposes of website management and user experience optimisation, is to be transferred to countries which do not have data protection laws equivalent to those in force in the European Economic Areas (EEA), we will inform the Data Subject in advance, unless that country is the country from where the Data Subject, your advisors or our instructing parties have communicated with us.

OT Experts does not transfer personal data internationally.

DATA PROTECTION AND SOCIAL MEDIA

OT Experts has no social media accounts.

YOUR RIGHTS

Unless the legal requirements of our processing take precedence, Data Subjects have a right of access to the information we hold about them, to know why and for how long it is being held, to have it amended if inaccurate and erased if no longer required. To access the data, a subject access request must be made in writing to the Data Controller.

Data subjects have the following rights:

1. The right to be informed; this means anyone processing your personal data must make clear what they are processing, why, and who else the data may be passed to.
2. The right of access; this is your right to see what data is held about you by a Data Controller.
3. The right to rectification; the right to have your data corrected or amended if what is held is incorrect in some way.
4. The right to erasure; under certain circumstances you can ask for your personal data to be deleted. This is also called 'the Right to be Forgotten'. This would apply if the personal data is no longer required for the purposes it was collected for, or your consent for the processing of that data has been withdrawn, or the personal data has been unlawfully processed.
5. The right to restrict processing; this gives the Data Subject the right to ask for a temporary halt to the processing of personal data, such as in the case where a dispute or legal case has to be concluded, or the data is being corrected.
6. The right to data portability; a Data Subject has the right to ask for any data supplied directly to the Data Controller by him or her, to be provided in a structured, commonly used, and machine-readable format.
7. The right to object; the Data Subject has the right to object to the further processing of their data which is inconsistent with the primary purpose for which it was collected, including profiling, automation, and direct marketing.
8. Rights in relation to automated decision making and profiling; Data Subjects have the right not to be subject to a decision based solely on automated processing.

AMENDMENTS

Please check this Data Protection and Privacy Policy occasionally on our website as we may update it from time-to-time. We may also notify our contacts of changes by email.

CONTACT

In the event of any questions arising about this Data Protection and Privacy Policy or our processing of personal data, please write to us at kate.makin@otexperts.co.uk or by post to the address listed on our contact page.