

# **MindYourService.com Limited**

## **General Data Protection Regulations**

### **Individual Awareness**

There are 3 people within the organisation who should be aware of the data we hold and in addition the Software developers need to be kept informed of the need to keep data private.

### **We hold the following data**

Client data in terms of their name location and transaction details

Clients use our SaaS service to transact business with their clients' but we have no control of that data or its accuracy. Clients, client data includes work done on behalf of those clients together with their addresses and assets serviced invoiced charged etc.

Details of our shareholders their addresses and contact details and share holdings

Details of our suppliers such as addresses and contact details

Details of our employees such as contact details pay rates etc

Mailing lists for potential customers purchased from third parties

### **We communicate our Privacy policy through a Privacy Notice which is on our website**

A copy of our most recent privacy policy is attached as an appendix to this document

### **Individual rights**

On request our clients have the right to the following

to be informed of the nature of the data we hold  
to access the information which is inherent within the software solution we provide  
to change any Client information that is incorrect which is inherent within the software  
to the deletion of the information with which we will comply with to the extent that certain information will need to be held for legal and statutory reasons.  
To port data in an acceptable machine readable format

### **Data Accessibility**

Shareholders, suppliers and employees Data is accessible by emailing [support@mindyourservice.com](mailto:support@mindyourservice.com). The software service provided that is available through the SaaS solution.

We will endeavour to respond to any requests within 72 hours. In the event of a requirement to port data to alternative systems this may take longer depending on the complexity of the need.

### **Lawful processing of data**

The Company will, at all times, ensure that employees are aware of the legal requirements to ensure that data is not used in a manner contrary to Law.

# **MindYourService.com Limited**

## **(and its subsidiary Companies)- (MYS)**

### **Privacy Policy**

MYS understands that your privacy and that of your clients is important to you and that you care about how your personal and corporate data is used and shared online. We respect and value the privacy of everyone who visits the website, [www.mindyourservice.com](http://www.mindyourservice.com) ("Our Site") and use our service management software and will only collect and use data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

#### **Definitions and Interpretation**

In this Policy, the following terms shall have the following meanings:

"Account" means an account required to access and/or use certain area and features of our site

"Cookie"

means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 13, below;

"Cookie Law"

means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 and of EU Regulation 2016/679 General Data Protection Regulation ("GDPR");

"Personal Data"

means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means

personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679- the General Data Protection Regulation ("GDPR"); and

"We/Us/Our" means

MindYourService.com Limited registered in England under company number 7341161, whose registered address is North Church House, 84, Queen Street, Sheffield S1 2DW and MIndYourService.com Inc . company number XXXXXXXXXXXX whose registered address is

### **Information About Us**

Our Site is owned and operated by MindYourService.com Limited a limited company registered in England under company number 7341161, whose registered address is North Church House, 84 Queen Street, Sheffield S1 2DW United Kingdom.

Our VAT number is 106579603.

### **What Does This Policy Cover?**

This Privacy Policy applies only to your use of Our Site and the related SaaS software. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them. We work with several providers to supply ancillary, connected services. Please refer to a given provider's privacy policy if you would like to know how the information will be used by them.

You can view the individual providers' privacy policies here:

[www.rackspace.com](http://www.rackspace.com)

[www.barclays.co.uk/important-information/electronic-commerce-directive/](http://www.barclays.co.uk/important-information/electronic-commerce-directive/)

[www.sagepay.co.uk](http://www.sagepay.co.uk)

[www.fastpayltd.co.uk](http://www.fastpayltd.co.uk)

[www.zendesk.com](http://www.zendesk.com)

[www.zoho.com](http://www.zoho.com)

### **Your Rights**

As a data subject, you have the following rights under GDPR, which this Policy and our use of personal/corporate data have been designed to uphold:

The right to be informed about Our collection and use of personal/corporate data;

The right of access to the personal/corporate data We hold about you;

The right to rectification if any personal/corporate data We hold about you is inaccurate or incomplete;

The right to be forgotten - i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 14);

The right to restrict (i.e. prevent) the processing of your personal data;

The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);

The right to object to Us using your personal data for particular purposes; and

Rights with respect to automated decision making and profiling

## **Complaints**

If you have any cause for complaint about Our use of your personal data, please contact us using the details provided in this document and We will do our utmost to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office at <https://ico.org.uk/global/contact-us/>

## **What Data Do We Collect?**

Depending upon your use of Our Site, we may collect some or all of the following personal and non-personal data

name;

business/company name;

contact information such as email address, postal address and telephone number;

on your behalf we hold your clients data and business that you transact with them ;  
payment details;  
IP address;  
web browser type and version;  
operating system;  
a list of URLs starting with a referring site, your activity on Our site, and the site you exit to;

**We also hold data on behalf of our clients' but we do not have any control over the accuracy and use of that date. You should refer to your immediate supplier to confirm their Privacy policy under GDPR**

### **How Do We Use Your Data?**

All personal/corporate data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the GDPR at all times. For more details on security see below.

Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in our legitimate interests. Specifically, We may use your data for the following purposes:

Providing and managing your transactional details;  
Providing and managing your access to Our Site;  
Personalising and tailoring your experience on Our Site;  
Supplying Our services to you (please note that we require your personal/corporate data in order to enter into a contract with you);  
Personalising and tailoring Our services for you;  
Replying to emails and telephone enquiries from you;  
Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience.

With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email, or through social media with information, news and offers on Our services. We will not, however, send you any unsolicited marketing or

spam and will take all reasonable steps to ensure that we fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

Third parties whose content appears on Our Site may use third party Cookies, as detailed below in section 13. Please refer to section 13 for more information on controlling Cookies. Please note that We do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.

You have the right to withdraw your consent to Us using your personal data at any time, and to request that we delete it.

We do not keep your personal/corporate data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):

Personal/corporate data provided in connection with your transactions will be retained for six full calendar months after the month in which your business with us ceases.

Personal/corporate data provided in connection with direct marketing or newsletters will be retained as long as your subscription remains active and your consent is considered to be valid.

### **How and Where Do We Store Your Data?**

We only keep your personal/corporate data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.

Most of your data will be stored within the United States of America. Some of your data may be stored inside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). You are deemed to accept and agree to this by using Our Site and submitting information to us. If we do store data outside the USA or EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the USA EEA and the UK

and under the GDPR including:

Ensuring that any US based companies are Privacy Shield Certified and their Model Contract clauses fully meet the requirements under the GDPR.

Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.

Steps we take to secure and protect your data include:

Using secure connections (HTTPS) when you access Our Site.

Encryption of any data prior to being backed up.

Encryption of connections between data processing facilities.

Restrictions on who within Our company can access your data.

### **Do we share Your Data?**

We contract with third parties to supply services to you on our behalf. These may include payment processing, service delivery, search engine facilities. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.

We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners. Data will only be shared and used within the bounds of the law.

We may sometimes use third party data processors that are located outside of the United States of America (USA) European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Where we transfer any personal data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the USA and EEA and under the GDPR including:



In certain circumstances, We may be legally required to share certain data held by us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

### **What Happens If Our Business Changes Hands?**

We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal/corporate data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us. In the event that any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted you will be given the choice to have your data deleted or withheld from the new owner or controller.

### **How Can You Control Your Data?**

In addition to your rights under the GDPR when you submit personal/corporate data via our site, you may be given options to restrict Our use of your data. In particular, we aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving such emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details).

### **Your Right to Withhold Information**

You may access Our Site without providing any personal/corporate data at all. You may restrict our use of Cookies but this may impact on the relevance of the use of our facilities.

### **How Can You Access Your Data?**

You have the right to ask for a copy of any of your personal/corporate data

held by us (where such data is held). under the GDPR, no fee would normally be payable and we will endeavour to provide any and all information in response to your request free of charge. Please contact Us for more details at [support@mindyourservice.com](mailto:support@mindyourservice.com),

## **Our Use of Cookies**

Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve our services. By using Our Site you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. Third party Cookies are used on our site for integration of third party content. In addition, our site uses analytics services provided by Google Analytics, which also use Cookies. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling us to better understand how people use our site.

## **Contacting us**

If you have any questions about Our Site or this Privacy Policy, please contact us by email at [support@mindyourservice.com](mailto:support@mindyourservice.com), or by post at MindYourService.com Limited North Church House, 84 Queen Street, Sheffield S1 2DW United Kingdom. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you.

## **Changes to Our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

*Last updates May 2018*