

# Privacy Policy

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Last updated: 7<sup>th</sup> April, 2020

Sideways Systems Ltd T/A Secure Remote Working ("us", "we", or "our") operates <http://www.secureremoteworking.co.uk> (change this) (the "Site"). This page informs you of our policies regarding the collection, use and disclosure of Personal Information we receive from users of the Site.

We use your Personal Information only for providing and improving the Site. By using the Site, you agree to the collection and use of information in accordance with this policy.

## Information Collection And Use

While using our Site, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to your name ("Personal Information").

## Log Data

Like many site operators, we collect information that your browser sends whenever you visit our Site ("Log Data").

This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics.

In addition, we may use third party services such as Google Analytics that collect, monitor and analyze data.

## GDPR Compliance Statement

We are committed to the principles inherent in the GDPR and particularly to the concepts of privacy by design, the right to be forgotten, consent and a risk-based approach. In addition, we aim to ensure:

- transparency with regard to the use of data
  - that any processing is lawful, fair, transparent and necessary for a specific purpose
- that data is accurate, kept up to date and removed when no longer necessary  
that data is kept safely and securely.

Our Data Protection Officer (DPO) works to promote awareness of the GDPR within the Company. Our DPO oversees the company's commitment to best practice and informs and advises executive staff in relation to compliance monitoring.

## Right to be forgotten

We recognise the right to erasure, also known as the right to be forgotten, laid down in the GDPR.

## **Subject access requests**

We recognise that individuals have the right to access their personal data and supplementary information and will comply with the one month timeframe for responses set down in the GDPR. As a general rule, a copy of the requested information will be provided free of charge although we reserve the right to charge a “reasonable fee” when a request is manifestly unfounded or excessive, particularly if it is repetitive. If this proves necessary, the data subject will be informed of their right to contest our decision with the supervisory authority (the Information Commissioner’s Office (ICO)).

As set out in the GDPR, any fee will be notified in advance and will be based on the administrative cost of providing the information.

## **Privacy**

We will implement data protection “by design and by default”, as required by the GDPR. Safeguards will be built into products and services from the earliest stage of development and privacy-friendly default settings will be the norm. The privacy notice, which is on our website and which is provided to anyone from whom we collect data, explains our lawful basis for processing the data and gives the data retention periods. It makes clear that individuals have a right to complain to the ICO. We have conducted a privacy impact assessment (PIA) to ensure that privacy risks have been properly considered and addressed.

## **Data transfers outside the EU**

We have put recognised procedures and safeguarding measures in place to secure, encrypt and maintain the integrity of any personal data that is transferred to countries outside the EU. Diligence checks are carried out to ensure that such countries have the necessary safeguards in place, provide enforceable data subject rights and offer effective legal remedies for data subjects where applicable.

## **Children**

The GDPR provides for special protection for children’s personal data and we will comply with the requirement to obtain parental or guardian consent for any data processing activity involving anyone under the age of 16. Systems have been introduced to verify individuals’ ages.

## **Data loss**

If a data breach occurs that is likely to result in a risk to the rights and freedoms of individuals, the people affected will be informed as soon as possible and the ICO will be notified within 72 hours.

## **Cookies**

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive.

Like many sites, we use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Site.

## **Security**

The security of your Personal Information is important to us, but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

## **Changes To This Privacy Policy**

This Privacy Policy is effective as of 7<sup>th</sup> April, 2020 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

## **Contact Us**

If you have any questions about this Privacy Policy, please contact us.