

Privacy Policy

Background:

Power Data Associates Ltd understands that your privacy is important to you and that you care about how your Personal Data (as defined below) is used and shared online. We respect and value the privacy of everyone who visits this website, www.UMSO.co.uk (“**our Site**”) and (subject to the limited exceptions in section 6, below) we do not collect Personal Data about you unless you contact us (see section 5, below). Any Personal Data we do collect will only be used as permitted by 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 or our products or services. If you do not accept and agree with this privacy policy, you must stop using our Site immediately.

1. Definitions and Interpretation

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

“**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 Power Data Associates Ltd, a private limited company registered in England under company number 04711888, whose registered address is Power Data Associates Ltd, Wrest Park, Silsoe, Bedford MK45 4HR.

2. Information About Us

2.1 Power Data Associates Ltd, a private limited company registered in England under company number 04711888, whose registered address is Power Data Associates Ltd, Wrest Park, Silsoe, Bedford MK45 4HR, is the **controller** of your Personal Data under the GDPR.

2.2 Our data protection manager is the Managing Director and can be contacted by email at Info@UMSO.co.uk, by telephone on 01525 601206, or by post at Power Data Associates Ltd, Wrest Park, Silsoe, Bedford MK45 4HR.

3. What Does This Policy Cover?

This privacy policy applies only to your use of our Site and our products and services. 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.

4. Your Rights

4.1 As a data subject, you have the following rights under the GDPR, which this policy and our use of Personal Data have been designed to uphold:

4.1.1 The right to be informed about our collection and use of personal data;

4.1.2 The right of access to the Personal Data we hold about you (see section 8);

4.1.3 The right to rectification if any Personal Data we hold about you is inaccurate or incomplete (please contact us using the details in section 9);

4.1.4 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 9);

- 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
 - 4.1.6 The right to data portability (obtaining a copy of your Personal Data to re-use with another service or organisation);
 - 4.1.7 The right to object to us using your Personal Data for particular purposes; and
 - 4.1.8 Rights with respect to automated decision making and profiling.
- 4.2 If you have any cause for complaint about our use of your personal data, please contact us using the details provided in section 9 and we will do our best 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.
- 4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

5. **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:

- 5.1 name;
- 5.2 date of birth;
- 5.3 gender;
- 5.4 business/company name;
- 5.5 job title;
- 5.6 profession;
- 5.7 contact information such as email addresses and telephone numbers;
- 5.8 demographic information such as postcode, preferences, and interests;
- 5.9 financial information such as credit / debit card numbers;
- 5.10 IP address;
- 5.11 web browser type and version;
- 5.12 operating system; and
- 5.13 a list of URLs starting with a referring site, your activity on our Site, and the site you exit to.

6. **How Do We Use Your Data?**

- 6.1 All Personal 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 section 7, below.
- 6.2 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:
- 6.2.1 Supplying our products and/or services to you (please note that we require your Personal Data in order to enter into a contract with you);
 - 6.2.2 Personalising and tailoring our products and/or services for you;
 - 6.2.3 Replying to emails from you;
 - 6.2.4 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by clicking the Unsubscribe link at the bottom of the email); and
 - 6.2.5 Market research.
- 6.3 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 and/or telephone and/or text message and/or post with information, news, and offers on our products and/or

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.

6.4 You have the right to withdraw your consent to us using your Personal Data at any time, and to request that we delete it.

6.5 We have set out below, in a table format, a description of all the ways we plan to use the various types of your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your Personal Data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data (as defined below this table)	Lawful basis for processing including basis of legitimate interest
To register you as a new customer/subscriber	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers/subscribers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers/subscribers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website and our services.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

7. **How and Where Do We Store Your Data?**

- 7.2 We only keep your Personal Data for as long as necessary to meet legal, regulatory and business requirements. You have certain rights to have your Personal Data erased or corrected (see section 4). Please inform us if you believe we hold inaccurate Personal Data about you.
- 7.3 Your data will only be stored within the European Economic Area (“the **EEA**”) (the EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein).
- 7.4 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.
- 7.5 Steps we take to secure and protect your data include:
- 7.5.1 Encryption
 - 7.5.2 Firewalls
 - 7.5.3 Anonymisation

8. **Do We Share Your Data?**

- 8.1 We may share your data with any other companies in our group for administration, compliance or tax. This includes any subsidiaries and/or holding company and its subsidiaries.
- 8.2 We may sometimes contract with third parties to supply products and services to you on our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising and marketing. 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.
- 8.3 Although we store your Personal Data within the EEA (see section 7) we may sometimes use third-party data processors that are located outside of the EEA, where the GDPR does not apply. Where we transfer any Personal Data to third parties (such as analytics providers and cloud storage companies) who process 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 UK and under the GDPR. We will always take steps to ensure that any international transfer of information is managed carefully and in accordance with data protection law to protect your rights and interests. These measures include:

8.3.1 transfers of your personal data to countries which are recognised as providing an adequate level of legal protection for personal data;

8.3.2 we have obtained the consent of data subjects to the international transfer of their personal data;

8.3.3 transfers to organisations where we are satisfied about their data privacy and security standards and protected by contractual commitments such as signing the EU Standard Contractual Clauses and, where available, further assurances such as certification schemes; and

8.3.4 if transferred to the United States of America, the transfer will be to organisations that are part of the Privacy Shield

8.4 You have the right to ask us for more information about our safeguards. Please contact the Data Protection Officer (contact details above)

8.5 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, and advertisers. Data will only be shared and used within the bounds of the law.

8.6 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 governmental authority.

9. **What Happens If Our Business Changes Hands?**

9.1 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 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.

9.2 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, however, be given a choice to have your data deleted or withheld from the new owner or controller.

10. **How Can You Control Your Data?**

10.1 In addition to your rights under the GDPR, set out in section 4, when you submit Personal 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 emails from us which you may do by unsubscribing using the links provided in our emails and at the point of providing your details).

10.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the **TPS**"), the Corporate Telephone Preference Service ("the **CTPS**"), and the Mailing Preference Service ("the **MPS**"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receive.

11. **Your Right to Withhold Information**

You may access certain areas of our Site without providing any data at all. However, to use all features and functions available on our Site you may be required to submit or allow for the collection of certain data (for example cookies as stated in our Cookie Policy).

12. **How Can You Access Your Data?**

You have the right to ask for a copy of any of your Personal Data held by us (where such data is held). Under the GDPR, no fee is payable, and we will provide any and all information in response to your request free of charge. Please contact us for more details using the contact details below in section 14.

13. **Our Use of Cookies and Analytics**

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. For more details, please refer to our cookie policy [\[LINK\]](#).

14. **Contacting Us**

If you have any questions about our Site or this privacy policy, please contact us by email at info@UMSO.co.uk, by telephone on 01525 601 206, or by post at Power Data Associates Ltd, Wrest Park, Silsoe, Bedford MK45 4HR. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you (as under section 13, above).

15. **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.