

PageOne Communications Ltd Privacy Policy

Last Updated: May 2018.

PageOne Communications Ltd

PRIVACY POLICY

All Data Protection related enquiries should be directed to Capita's Data Protection Officer. Please contact PageOne to request the current DPO contact details.

Who are we? What do we do?

PageOne is part of Capita Group Plc. We provide integrated messaging & communication solutions for organisations across the UK. We are recognised for producing quality services and align ourselves with ISO27001 Information Security Management Standards.

This Privacy Policy is intended for use with our services and websites www.pageone.co.uk and www.oventus.com and in conjunction with our Customer Support and marketing functions to which existing customers may be directed from time to time.

If you submit your personal information through this Website, you are allowing it to be being processed in the manner described within this Privacy Policy.

PageOne realises the importance of providing you with a clear and honest explanation of what personal data is and what we collect from you, how we use it, where we store it and for how long, whether we share your information with anyone else and what rights you have over your personal data.

Your personal data – what is it?

“Personal data” means data that alone or when in combination with other data may be used to readily identify, contact, or locate you, such as: name, address, email address, or phone number. We do not consider “Personal data” to include information that has been anonymised so that it does not allow a third party to identify a specific individual. The processing of personal data is governed by *The Data Protection Act 1998* and will be superseded on 25 May 2018 by *the General Data Protection Regulation 2016/679 (GDPR)*, these laws are referred to collectively in this Privacy policy as "data protection laws".

How do we collect your personal data?

PageOne collects information from people visiting our websites through visitors emailing PageOne or completing online forms, through site usage information, using cookies and page tagging techniques and from information entered, stored, sent, received or transmitted whilst operating subscription - services that have been provisioned by PageOne for customer use. For more information on how we use cookies to support your use of our site, please see our related Cookies Policy at www.pageone.co.uk/downloads/policy/Cookie-Policy.pdf

Personal data submitted to us over the telephone or via email for Customer Support purposes will be afforded the same high level of data protection care. Support provided by telephone may be recorded for the purposes of ensuring quality delivery to our customers and will be subject to the retention policies of Capita. Similarly, support provided to customers by PageOne via email will be subject to the same retention periods. For more detail on PageOne's retention periods please contact customersupport@pageone.co.uk

How do we process your personal data?

Simply put, we do not and will not sell or rent your personal data, for any reason. PageOne uses and discloses your Personal Information only as follows:

- processing orders and enquiries, managing and administering your account or accounts; delivering and supporting products and services you have subscribed to; providing information that you request; responding to complaints or enquiries; overseeing debt recoveries; authenticating your identity.

You may contact us at any time to have your details removed from lists used by us for marketing purposes, to update your information or to advise us how you would like to receive information about our and/or third-party products and services. To update your marketing preferences please e-mail marketing@pageone.co.uk quoting your account number in the body of the e-mail and informing us of your request (e.g. 'opt-out E-mail', 'opt-out SMS', 'opt-in post') in the subject of your e-mail.

PageOne may disclose your Personal Information in good faith if it believes such action is necessary. Examples may include conforming to a legal requirement, complying with a legal process, protecting/defending the rights or property of PageOne, enforcing this Privacy Policy, or protecting the interests of our users.

At PageOne we only request the minimum amount of information from you to enable us to effectively perform the related tasks. We politely request that to help us comply with the principle of data minimisation, by only submitting relevant and necessary personal data.

PageOne complies with its Data Protection obligations under data protection laws by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical and organisational measures are in place to safeguard personal data.

Why we need your data.

We may need certain details to fulfil our contractual obligations to you. If you are a customer of ours or a representative thereof and contact us for support purposes, either by telephone or email our lawful basis for processing is based upon the fulfilment of these contractual obligations.

When personal data is submitted to us through our website, the lawful basis for any subsequent processing we do on your behalf will be based upon legitimate interests. We will use your information in a manner which is consistent with the original purpose it was collected for. We collect and use personal information for our legitimate business purposes of communicating with you, to

help with your enquiries and fulfilling your requests for services. However, if at any time you wish to stop receiving communications from us please send an email to customersupport@pageone.co.uk

How long do we keep your personal data for?

We keep your personal data for no longer than is reasonably necessary. Personal data will be subject to the Data Retention Policies of Capita. A periodic review will be carried out to ensure all information held remains relevant. For more detailed information on Data Retention contact us on [insert contact details].

Your rights and your personal data.

Unless subject to an exemption, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for us to retain such data;
- The right to request that we provide data subjects with his/her personal data and where possible, to transmit that data directly to another data controller.
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to lodge a complaint with the Information Commissioner's Office.

For more information about your rights as a Data Subject and data protection laws please visit the Information Commissioner's website at www.ico.org.uk

How can you access your personal information?

You have a right to access your personal information by making a Subject Access Request to PageOne at any time you wish to see what personal information we hold about you and how we are using it; so, you can be satisfied it is being processed lawfully. You can ask for copies of this information and we will usually provide it free of charge and within one month of the date we receive your request (unless there are exceptional circumstances when we may then charge a reasonable fee to cover administrative charges or advise you that we require longer to deal with your request).

Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Policy, then we will contact you explaining this new use prior to commencing any processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Contact Details

To exercise all relevant rights, such as Subject Access Requests, queries or complaints please in the first instance contact the PageOne team at customersupport@pageone.co.uk or by using our postal address:

PageOne Communications Ltd, 12th Floor GW1, Great West House, Great West Road, Brentford, Middlesex, TW89DF.

If you would like to raise a Data Protection related complaint, you can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office address: Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

Declaration

By submitting personal data to us, you are declaring that you have read and understood this Data Protection Policy and that you acknowledge the prescribed lawful basis for processing your personal data for the stated purposes.

Please assist us in ensuring your personal data is kept accurate and up to date. Should your personal details change please inform us so that your records can be amended.

We regularly review our Privacy Policies; where we consider significant changes have been made, we will endeavour to bring this to your attention.

Thank You.