

Privacy Notice and General Data Protection Requirement Statement 24th May 2018

1. How we use your data?

This article will explain what data Information Mechanics collects and how we use it and the choices you have about the data we collect.

2. What information does Information Mechanics as a data controller collect?

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 and title.
- Contact data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes name of bank, address of bank, account number and named signatories if your account is settled by cheque.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Technical Data collected by Information Mechanics as the primary data controller, which includes internet protocol (IP) address, browser type and version, time zone setting and location, access logs, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website. Details of the email servers (server names, date and time) which have been used to send us emails.
- Technical Data collected by Information Mechanics on behalf of “the Client” who is the primary data controller is available on request.

We also record information when you contact us, including customer service requests and notes or details explaining what you asked and how we responded. We use third party remote access support technologies for whom we have a contract and are GDPR compliant to fulfil any IT support request.

3. Acting as a Data Processor & Data Controller

When we act on behalf of clients we are both a data controller and data processor depending on the activity. When processing data on behalf of the data controller “the Client”. We will take instructions on how the data controller would like their data processed.

When we act as a Data Controller on behalf of a client, we will collect information in a manner which complies with procedures adopted by the organisation “the Client” who has the ultimate responsibility as the primary Data Controller.

Within the terms of the agreement with the data controller, and our contract, the data processor/data controller “Information Mechanics” may decide:

- what IT systems or other methods to use to collect personal data;
- how to store the personal data;
- the detail of the security surrounding the personal data;
- the means used to transfer the personal data from one organisation to another;
- the means used to retrieve personal data about certain individuals;
- the method for ensuring a retention schedule is adhered to; and
- the means used to delete or dispose of the data.

As the data processor in providing services to our clients, we will seek the consent of its data controller “the Client” prior to sub-contracting out any of our services.

An example of Information Mechanics being a data controller on behalf of a client would be receiving information from a third party as a result either Information Mechanics making an application for a service on behalf of “the Client” and authorising a service made by an internal/external individual to use a service provided by “the Client” who is the ultimate data controller.

4. How does Information Mechanics use your information for?

We use information about you to deliver the services you have requested. For example, we use information that you have provided to create online accounts, deliver our services and detect and prevent fraud and abuse when monitoring your IT systems. Please see below our role as a data controller on behalf of “the Client”.

5. Does Information Mechanics share our data with third parties?

When procuring services on your behalf we will ask you beforehand whether we can include you on the initial email and which you then decide whether you provide this information to third parties.

6. International transfers

We do not transfer your personal data outside the European Economic Area (EEA) unless we are acting on behalf of “the Client”, a third party or “the Client” head office which operates in a jurisdiction permitted by EU-US Privacy Shield.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. These measures are based on the guidelines set out in ISO27001 All the devices and third-party services we employ using secure credentials, hardware/software encryption, two-factor authentication where available and secure communication channels i.e. SSL/TLS and VPNs. All our computer systems have anti-virus, anti-malware, IDP (Intrusion Detection and Prevention) and backups. Our network is segmented based on a risk assessment and is protected by a reputable firewall manufacturer which is currently in support and running the latest recommended operating system. Physical security controls at our premises are in place to protect against any unauthorised intrusions.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, reporting requirements or completion of an activity requested by “the Client”.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available from request.

You have rights under data protection laws in relation to your personal data. Below is a non-exhaustive list of some of these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent of us holding your data.

If you wish to exercise any of the rights set out above, please contact us.

9. Security training

Our employees/contractors receive annual training and periodic bulletins regarding good security practices. We also take the opportunity where possible to offer IT Security advice where possible.

10. Contact Us

If you have any questions, concerns, or complaints about our privacy policy or the practices of our services, you may contact our us by email at privacy@informationmechanics.com.

As an alternative, you may contact us by either of the following means:

By Mail: Attn: Information Mechanics Limited, Alton House, 256 Malden Road, New Malden, Surrey KT3 6AR. By Phone: +44 20 3355 6105.

We will respond to all requests, inquiries or concerns within thirty (30) days.

GDPR Terms

“data controller” means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be processed

“data breach” means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes.

“data processor”, in relation to personal data, means any person (other than an employee of the data controller)

“personal data”, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

“processing”, in relation to information or data means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data, including— a) organisation, adaptation or alteration of the information or data, b) retrieval, consultation or use of the information or data, c) disclosure of the information or data by transmission, dissemination or otherwise making available, or Data controllers and data processors alignment, combination, blocking, erasure or destruction of the information or data.

“ISO 27001 ” (formally known as **ISO/IEC 27001:2005**) is a specification for an information security management system (ISMS). An ISMS is a framework of policies and procedures that includes all legal, physical and technical controls involved in an organisation's information risk management processes.