

Why do we have a privacy policy?

Firstly, we are under a legal obligation to let you know what personal information we collect about you, what we use it for and on what basis. We always need a good reason and we also have to explain to you your rights in relation to that information. You have the right to know what information we hold about you, to have a copy of the information and for that information to be changed or sometimes deleted.

The reasons we collect information are set out in this privacy policy, but we are not telling you this just because we have to. As a service provider, much of what we do involves using personal information and we believe that it is very important for our customers to trust us with that information. We want you to be confident that we will keep it secure and use it both lawfully and ethically whilst respecting your privacy.

Whatever we do with your information, we need a legal basis for doing it. We generally rely on one of three grounds (reasons) for our business processing. Firstly, if you have ordered or take a service from us, we are entitled to process your information so that we can provide that service to you and you can be billed for it in accordance with your booking terms and conditions.

Secondly, if we want to collect and use your information for other purposes, we may need to ask for your consent (permission) and, if we do, that permission must always be indicated by a positive action from you (such as ticking a box) and you will be informed. You are also free to withdraw your permission at any time. We tend to need permission when what is proposed is more intrusive (for example, contacting you about rates and availability for the event you are attending and may attend in the future)

However, we do not always need permission. In some cases, having assessed whether our use would be fair and not override your right to privacy, we may come to the view that it falls within the third ground – our 'legitimate interests' to use the information in a particular way without your permission. But when we do this, we must tell you as you may have a right to object. And if you object specifically to us sending you marketing material, or to 'profiling you' for marketing purposes, we must then stop.

This is all set out in detail in this policy, which focuses more on those items that we think are likely to be of most interest to you. As well as covering processing for business purposes, we give you information on circumstances in which we may have to, or can choose to, share your information.

Our privacy policy.

Please read the policy carefully as it applies to the products and services we provide you and our websites. It also applies even if you're not one of our customers and you interact with us, such as by:

- Using one of our products or services – paid for by someone else
- Taking part in a survey or trial
- Your details being passed to us by someone else
- Generally enquiring about our services

Personal information is information from which you can be personally identified such as your name, address, email address, or telephone number. It is important that you read and understand this Privacy Policy ("Policy").

If you need to give us personal information about someone else in relation to our products and services, the privacy policy will also apply and if we need the permission of the other person to use that information, we'll ask you to check they are OK with this.

Changes to this policy

We may change this privacy notice from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. We encourage you to check this privacy notice for changes whenever you visit our website – itadvocate.co.uk.

For the purposes of the Data Protection Act 1998 (the "Act"), the data controller is ITAdvocate 3rd Floor Office, 207 Regent Street, London, W1B 3HH.

Accessing the Information we hold about you.

Under the Data Protection Act 1998, you have a right to know what personal information we hold about you. If you'd like a copy of the information you are entitled to please write to The Data Protection Officer, of Newton House, Northampton Science Park, NN3 6LG, clearly identifying yourself and the information you require. We may charge you £10 to cover the cost of processing your request and supplying your information to you. We will ask you to provide identification to ensure we do not disclose your information to the wrong person.

WHAT KINDS OF PERSONAL INFORMATION DO WE COLLECT?

Personal Information

User Communications

When you send email or other communication to ITAdvocate Limited or another user, we may retain those communications in order to process your enquiries, respond to your requests and to improve our services.

Affiliated Sites

We may offer services in connection with other Web sites or suppliers. Personal information that you provide to those sites may be sent to us in order to deliver these services. We process such information in accordance with this Privacy Policy.

Cookies

Our online services may use cookies (small pieces of information that are stored by your browser on your computer's hard drive). Our cookies do not contain any personally identifying information, but they enable us to store your delivery details between visits so that you don't have to re-enter information every time you return to a site.

Why and how do we use the information we collect about you.

To provide you with products and services.

We'll use your personal information to process your bookings or provide you with products and services.

This means we will

- Record details about the products and services you use or order from us
- Send you product or service-information messages (we'll send you messages to confirm your order and tell you about any changes that might affect your service.
- Let you create and log in to the online accounts we run

To do this we collect:

- Your contact details and other information to confirm your identity and your communications with us. This includes your name, gender, address, phone number, date of birth, email address, passwords and credentials (such as the security questions and answers we have on your account)
- Your payment and financial information.
- Your communications with us, including emails, webchats and phone calls. We'll also keep records of any settings or communication preferences you choose
- Information from cookies placed on your connected devices that we need so we can provide a service

Because it's in our interests as a business to use your information We'll use your personal information if we consider it is in our legitimate business interests so that we can operate as an efficient and effective business.

We use your information to:

- Identify, and let you know about, products and services that interest you
- Create aggregated and anonymised information for further use

To market to you and identify products and services that may be of interest to you. We do this if you have been a previous customer or if we have been authorised to do so by your official event organiser. This means we will

- Tell you about other products and services you may be interested in
- Recommend better ways to manage your spend with us, like suggesting a more suitable product based on your requirement
- Try to identify products you're interested in

- Show you more relevant online advertising and work with other well-known brands to make theirs more suitable too

We use the following for marketing and to identify products and services you're interested in.

- Contact details (Name, Email address, Company name)
- Past booking details
- Information from other organisations such as our partners and publicly available sources like the electoral roll and business directories

We'll send you information (about the products and services we provide) by phone, post, email or text message. We also use the information we have about you to personalise these messages wherever we can as we believe it is important to make them relevant to you. We do this because we have a legitimate business interest in keeping you up to date with our products and services, making them relevant to you and making sure you manage your spending with us. We also check that you are happy for us to send you marketing messages by email before we do so. In each message we send, you also have the option to opt out.

We have a legitimate interest in generating insights that will help us operate our network and business or would be useful to other organisations.

To create aggregated and anonymised data

We'll use your personal information to create aggregated and anonymised information. Nobody can identify you from that information and we'll use it to;

- Run management and corporate reporting, research and analytics, and to improve the business; and
- Provide other organisations with aggregated and anonymous reports

We'll use the following to generate aggregated and anonymous information

Your gender, and name.

Information about what you bought from us.

To develop our business and better understand our customers' needs.

This means we will

- Maintain and develop our systems and processes to provide you with a better service
- Train our people and suppliers to provide you with products and services (but we make the information anonymised whenever possible)
- Retain some information to better understand you as our customer
- Run surveys and market research about our products

We use the following information to do this;

- Your contact details
- Your payment and financial information
- Your communications with us, including emails, webchats and phone calls (should any recordings be taken)
- Information on cookies placed on your connected devices
- Details of the products and services you've bought (booking details)

If we use this information for market research, training and development purposes and we do so because it is in our legitimate business interests of running an efficient and effective business which can adapt to meet our customers' needs.

To collect debt

If you don't pay your bills, we might ask a debt-recovery agency to collect what you owe. We'll give them information about you (such as your contact details), your account (the amount of the debt) and may choose to sell the debt to another organisation to allow us to receive the amount due.

To meet our legal and regulatory duties

We might have to release personal information about you to meet our legal and regulatory obligations.

To Law Enforcement Agencies

Under investigatory powers legislation, we might have to share personal information about you to government and law-enforcement agencies, such as the police, to help detect and stop crime, prosecute offenders and protect national security.

They might ask for the following details.

- Your contact details. This includes your name, gender, address, phone number, date of birth, email address, passwords and credentials (such as your security questions and answers) needed to confirm your identity and your communications with us
- Your communications with us, such as calls, emails and webchats
- Your payment and financial information
- Details of the products and services you've bought and how you use them

We'll share personal information about you where we have to legally share it with another person. That might be when a law says we have to share that information or because of a court order.

In limited circumstances, we may also share your information with other public authorities, even if we do not have to. However, we would need to be satisfied that a request for information is lawful and proportionate (in other words, appropriate to the request). We would also need appropriate assurances about security and how the information is used and how long it is kept before sharing.

Sharing of Information

ITAdvocate will not share or sell personal information about you with third parties or non-affiliated companies except to provide the products or services you have requested or when we have your permission or under the following circumstances;

- We may provide your personal information to business partners or other trusted businesses or persons, for the purpose of processing personal information on our behalf. These parties are required to process such information based on our instructions and in accordance with this Policy. They do not have any independent right to share this information.
- We may share your personal information with a credit checking company or with a credit card processing company to bill users for our services. These third parties do not retain, share, or store any personally identifiable information except to provide these services and are bound by strict confidentiality agreements which limit their use of such information.
- We believe that it is necessary to disclose such information to satisfy any applicable law, regulation, legal process or enforceable government request and investigate violations thereof. To prevent, detect and address fraud, security or technical issues, or to protect against harm to the rights and property of ITAdvocate and its users as required or permitted by law.
- We may transfer your personal information if ITAdvocate is acquired by or merged with another company. We will provide notice before this occurs and will post a new Privacy Policy if necessary.

How have we obtained the information about you?

From you directly when you have used our service in the past.

From a third party such as a colleague who may have made a booking on your behalf.

From an event organiser who may have passed us your details to allow us to deliver our service for them.

Protecting your information.

- To secure your personal information, access to your data is password protected, and sensitive information is protected by encryption when it is exchanged between your Web browser and our website. To protect data stored on our servers, we regularly audit our system for possible vulnerabilities and attacks. Whilst we will implement the security measures detailed above, transmission of information via the internet is not completely secure and therefore transmission via the internet is at your own risk.
- Any information provided by you in connection with any transaction regarding your credit or debit card numbers, expiry date and billing or delivery address will be used by us to process the transaction. These details will be encrypted and stored on a secure server and may be used by us to facilitate and personalise future transactions with you. We will only store data in accordance with PCI DSS

Regulations and only those details required will be stored. We never store any PIN numbers or security codes.

How long do we keep your personal information?

- For as long as we have reasonable business needs, such as managing our relationship with you and managing our operations
- For as long as we provide goods and/or services to you and then for as long as someone could bring a claim against us; and/or
- For retention periods in line with legal and regulatory requirements or guidance

Is your personal information transferred outside the UK or EU?

We're based in the UK but sometimes your personal information may be transferred outside the European Union. If we do so we'll make sure that suitable safeguards are in place, for example by using approved contractual agreements, unless certain exceptions apply. By using a ITAdvocate service, you consent to any such transfer of your information outside your country and the EU.

How and when can you withdraw your consent?

Where we're relying upon your consent to process personal data, you can withdraw this at any time. To do so, please email guy.bates@itadvocate.co.uk and enclose which details you would like removed and from what source. You must have the permission to suppress other individual's data, if you are doing so on their behalf.

Do you have to provide us with your personal information?

We're unable to provide you with our products or services if you do not provide certain information to us. In cases where providing some personal information is optional, we'll make this clear.

Your rights under data protection laws

Here is a list of the rights that all individuals have under data protection laws. They don't apply in all circumstances. If you wish to use any of them, we'll explain at that time if they are engaged or not. The right of data portability is only relevant from May 2018.

- The right to be informed about the processing of your personal information
- The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed
- The right to object to processing of your personal information
- The right to restrict processing of your personal information
- The right to have your personal information erased (the "right to be forgotten")
- The right to request access to your personal information and to obtain information about how we process it
- The right to move, copy or transfer your personal information ("data portability")
- Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you

You also have the right to complain to the Information Commissioner's Office which enforces data protection laws: <https://ico.org.uk/>. You can contact us using the details below.

If you have any questions or comments about this privacy notice, or if you wish to exercise your rights or contact the DPO, you can contact us by going to the Contact Us section of our website. Alternatively, you can email us at guy@itadvocate.co.uk marking it for the attention of the DPO.