

## Table of Contents

Purpose of this Policy.....	2
Audience.....	2
Enquiries.....	2
Basis for the Policy.....	3
Contact .....	3
Data We Collect .....	4
Data Usage .....	7
Lawful Basis for Use .....	8
Controlling Access and Sharing of Data.....	11
Intent to Transfer Information .....	11
Retention .....	13
Your Rights .....	14
Cookies.....	16
Cookies that we use.....	17
ICO Registration .....	20
Changes to this Privacy Policy .....	21

## Purpose of this Policy

The purpose of this Policy is to lay out the framework under which Tiedata will restrict access to and manage the confidentiality, integrity and accuracy of personal data.

## Audience

This policy will be published to all Tiedata staff, customers and suppliers and will be made available to the public.

## Enquiries

Enquiries about this policy can be :-

- emailed to [datacontroller@tiedata.com](mailto:datacontroller@tiedata.com)
- made by telephone on 01773 513 513 Option 1.
- posted to Tiedata Limited, 11 High Holborn Road, Codnor Gate Industrial Estate, Ripley, DE5 3NW

## Basis for the Policy

Tiedata Limited is a business providing IT Services and Support to UK-based client organisations from premises at 11 High Holborn Road, Codnor Gate Business Park, Ripley, Derbyshire DE5 3NW.

Tiedata Limited operates within the European Union (EU) and the European Economic Area (EEA) and as such is required to operate in accordance with the provisions of the EU Privacy and Electronic Communications Regulations and the EU General Data Protection Regulations. These set out the means by which an organisation can collect, store, manage, communicate, share and hold information about individuals and what rights the individual has in respect of that data.

This policy details all the information relating to those rights and Tiedata's responsibilities to data subjects in respect of the information.

## Contact

The Data Controller for Tiedata is Mr R Kalra who can be contacted via email at [datacontroller@tiedata.com](mailto:datacontroller@tiedata.com) or by phone on 01773 513 513.

## Data We Collect

### *Customers*

We collect contact information about organisations, individuals who work at those organisations and the IT equipment used at those organisations once we have a contractual relationship with them.

We only collect the information necessary to fulfil our contractual obligations to our customers. We may under certain circumstances collect password information for individuals but these will never be recorded or stored.

### *Suppliers*

We collect contact information about organisations and individuals who work at those organisations once we have a contractual relationship with them.

We only collect the information necessary to fulfil our contractual obligations to our suppliers.

### *Employees*

We collect personal data from employees regarding their basic identity and tax/National Insurance information as necessary to be able to employ, remunerate and manage their holiday, sick time and working hours.

We only collect the information necessary to fulfil our contractual and legal obligations to our employees.

### *Marketing*

We collect details of prospective client organisations and relevant individuals who may work at those organisations and of anyone who specifically requests to receive information about Tiedata Limited and our services.

We only collect the information necessary to ascertain whether certain information regarding Tiedata Limited and its services may be of interest and to facilitate the sending of this information.

Without limitation, any or all of the following personal information may be collected:

Information	Customer	Supplier	Employee	Marketing Contact
Name	?	?	?	?
Address/Postcode	?	?	?	?
Telephone No.	?	?	?	?
Email address	?	?	?	?
Job Title	?	?	?	?
Date of Birth			?	
Gender	?	?	?	?
Next of Kin Details			?	
Interests			?	
Salary			?	
NI Number			?	
Bank Details	?	?	?	
Previous Employers			?	
IP Address	?		?	
Web Browser info	?		?	?
Web Browsing Habits			?	?
Passport copy			?	
Driving Licence copy			?	
Gender, marital status, information of any disability you have or other medical information			?	
Right to work documentation			?	
Information gathered via the recruitment process such as that entered into a CV or			?	

included in a CV cover letter				
References from former employers			?	
Details on your education and employment history			?	
Tax codes			?	
Criminal convictions			?	
IT equipment use including telephones and internet access			?	
details of formal and informal proceedings involving you such as letters of concern, disciplinary and grievance proceedings, your annual leave records, appraisal and performance information			?	
information on time off from work including sickness absence, family related leave			?	

## Data Usage

### *Customers*

The information we collect with regard to established customers is used for a variety of purposes as follows:

- To enable us to effectively fulfil contractual obligations to our clients such as contacting individuals with difficulties to help us rectify their issue; arranging appointments to install or maintain equipment.
- To remotely connect to systems to enable prompt and efficient computer support activity.
- To facilitate the effective management and upkeep of computer systems and their security.
- For continued and better targeted marketing information relating to additional services of relevance that we can provide.

### *Suppliers*

The information we collect with regard to established suppliers is used for a variety of purposes as follows:

- To enable us to order services and goods.
- To process invoices and make payments.
- To enable us to manage our ongoing relationships with the supplier.

### *Employees*

The information we collect with regard to employees is used for a variety of purposes as defined in the following section (Lawful Basis for Use).

### *Marketing*

The data we collect in respect of prospective customers is used to enable us to contact organisations and their representatives by various means in order to keep them informed of the services offered by Tiedata and other information relating to the IT industry that may be relevant to them.

## Lawful Basis for Use

### *Customers*

We collect customer data on the basis of *Contractual Obligation*. The Contractual Obligations are detailed upon a client-by-client basis in the agreements made between us.

### *Suppliers*

We collect information about our Suppliers on the basis of *Contractual Obligation*. The particular obligations will be determined by individual supplier contracts.

### *Employees*

The law on data protection allows us to process your data for certain reasons only. In the main, we process your data in order to comply with a legal requirement or in order to effectively manage the employment contract we have with you, including ensuring you are paid correctly.

The information below categorises the types of data processing, appropriate to your status, we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Carry out the employment contract that we have entered into with you e.g. using your name, contact details, education history, information on any disciplinary, grievance procedures involving you	Performance of the contract
Ensuring you are paid	Performance of the contract
Ensuring tax and National Insurance is paid	Legal obligation
Carrying out checks in relation to your right to work in the UK	Legal obligation
Making reasonable adjustments for disabled employees	Legal obligation



Making recruitment decisions in relation to both initial and subsequent employment e.g. promotion	Our legitimate interests
Making decisions about salary and other benefits	Our legitimate interests
Ensuring efficient administration of contractual benefits to you	Our legitimate interests
Effectively monitoring both your conduct, including timekeeping and attendance, and your performance and to undertake procedures where necessary	Our legitimate interests
Maintaining comprehensive up to date personnel records about you to ensure, amongst other things, effective correspondence can be achieved and appropriate contact points in the event of an emergency are maintained	Our legitimate interests
Implementing grievance procedures	Our legitimate interests
Assessing training needs	Our legitimate interests
Implementing an effective sickness absence management system including monitoring the amount of leave and subsequent actions to be taken including the making of reasonable adjustments	Our legitimate interests
Gaining expert medical opinion when making decisions about your fitness for work	Our legitimate interests
Managing statutory leave and pay systems such as maternity leave and pay etc	Our legitimate interests
Business planning and restructuring exercises	Our legitimate interests
Dealing with legal claims made against us	Our legitimate interests
Preventing fraud	Our legitimate interests
Ensuring our administrative and IT systems are secure and robust against unauthorised access	Our legitimate interests
Providing employment references to prospective employers, when our name has	Legitimate interest of the prospective employer

been put forward by the employee/ex-employee, to assist with their effective recruitment decisions	
--	--

In the main we do not collect Special Category of data, but employee files may contain health related records which will be used in our management of sickness absence.

Most commonly, we will process special categories of data when the following applies:

- a) you have given explicit consent to the processing
- b) we must process the data in order to carry out our legal obligations
- c) we must process data for reasons of substantial public interest
- d) you have already made the data public.

### ***Marketing***

We collect marketing data on the basis of Legitimate Interest. The Legitimate Interests upon which this assessment is based are to enable the promotion of Tiedata services to client and potential client organisations.

## Controlling Access and Sharing of Data

### *Customers*

As a customer, your data will be available to the entire Tiedata team and may under certain circumstances be made available to third party organisations who provide the background services we provide for you.

Any organisation with whom we share your data will have been verified for their commitment to conform to the General Data Protection Regulations.

### *Suppliers*

As a supplier, your data will be made available to Tiedata staff only and never shared with any other third party. There may be one variance to this where there are multiple parties involved in the provision of a single service to Tiedata and/or our customers and the service is faulty; Tiedata may facilitate suppliers contacting each other directly.

### *Employees*

As an employee, some of your data will be available to the managers in your chain of command and to the directors of Tiedata. Some of your data may be made available to other Tiedata employees as required. Some of your data will be made available to external organisations whose services we use.

Any organisation with whom we share your data will have been verified for their commitment to conform to the General Data Protection Regulations.

### *Marketing*

As a marketing related data subject some of your information will be made available to the Tiedata sales and marketing team only and will not be made available to any third party or other organisation.

## Intent to Transfer Information

Some of our customers may be using services (such as Office 365) which store data outside the EEA. Those organisations publish their own GDPR compliance statements (for instance Microsoft's can be accessed here:

<https://www.microsoft.com/en-us/TrustCenter/Privacy/gdpr/default.aspx> ).

As employees you may need to contact, and give your contact details to, organisations who operate outside the EEA as part of your duties.

Those third party organisations only process the data they receive from Tiedata in order to fulfil their legal and contractual obligations related to the services which they provide.

## Retention

There is no specific time period attached to data retention by Tiedata. However the following circumstances will drive removal of personal data.

- **Customers**
  - Once our contract with a customer expires or comes to a close by any means, then personal data not connected with finances will be redacted
  - Financial data relating to transactions between Tiedata and the third party will be retained as per the Statute of Limitations Act 1980.
  
- **Suppliers**
  - Once our contract with a supplier expires or comes to a close by any means, then personal data not connected with finances will be redacted
  - Financial data relating to transactions between Tiedata and the third party will be retained as per the Statute of Limitations Act 1980.
  
- **Employees**
  - Once your employment at Tiedata ends we will cease to process data that is no longer required under our legal obligations.
  - Data processed under legal obligations will be retained for a period of ten years following termination of employment.
  - Bank details for employees will be removed or redacted once three months has elapsed from termination of employment.
  
- **Marketing**
  - When the contact details we have cease to be valid.
  - When a current contact requests that their data is removed.

## Your Rights

### *Access to Personal Data*

You have the right as a data subject to request copies of your personal information and data that we hold. This will be provided in a timely manner and in the most appropriately suitable format.

### *Erasure and Objection to Data Processing*

You have the right as a data subject to request your personal data be removed and when the data is only held on the basis of your consent, to withdraw that consent. You also have the right to request your personal data cease to be processed in the future.

As a member of a customer or supplier organisation, your personal data will be removed or redacted to the extent possible while maintaining our ability to fulfil our obligations to your organisation.

As an employee or former employee, we will not be able to cease processing your personal data due to our legal obligations, until those obligations expire. We will at all times only process the minimum data required to honour our obligations in this regard.

As a marketing contact, your personal data will be removed from marketing lists on receipt of such a request, and stored in a “Do Not Contact” list instead. This will prevent us from re-adding the information at a later date unless at your own specific request.

### *Rectification*

You have the right as a data subject to request your personal data be rectified or corrected.

As a member of a customer or supplier organisation, your personal data will be removed or redacted to the extent possible while maintaining our ability to fulfil our obligations to your organisation.

As an employee or former employee, we will not be able to cease processing your personal data due to our legal obligations, until those obligations expire. We will at all times only process the minimum data required to honour our obligations in this regard.

As a marketing contact, your personal data will be removed from marketing lists on receipt of such a request, and stored in a “Do Not Contact” list instead. This will prevent us from re-adding the information at a later date unless at your own specific request.

All enquiries relating to your rights as a data subject can be :-

- emailed to [datacontroller@tiedata.com](mailto:datacontroller@tiedata.com)
- made by telephone on 01773 513 513 Option 3.
- posted to Tiedata Limited, 11 High Holborn Road, Codnor Gate Industrial Estate, Ripley, DE5 3NW

### *Right to Complain*

If as a data subject you have cause for complaint about how we have handled your information, you should initially address your complaint via the contact details above.

If we do not satisfactorily resolve your complaint with our explanation which we will deliver in writing, you may raise your complaint with the Information Commissioner’s Office using their online guidance at <https://ico.org.uk/concerns/>.

You may instead/also wish to raise your complaint via the Courts; in this scenario you should obtain legal advice.

No automated decisions are made on the basis of the information or data we hold.

## Cookies

Our aim is to continually improve the experience you have when you visit our website. As part of this process we use cookies. Cookies are small text files containing information about your browsing session (e.g. which pages you visited) which are located in your browser directory.

We use different types of cookies and each has a specific function. Some cookies are essential to the working of the website and allow you to navigate easily from page to page and perform certain functions. Other non-essential cookies allow us to analyse how you use our site, which enables us to make decisions about how best to improve the website design and functionality to fit your future needs.

We will not store personally identifiable information such as credit card or address details in the cookies we create. All data collected using a cookie will be anonymous and will not hold specific knowledge of who a visitor is.

Usually web browsers are set to accept cookies. If you have visited this site, however, and did not want cookies to be used, please exit the site and use your browser tools settings to delete the cookies. If you do this and revisit this site, cookies will again be set unless you change your browser settings to reject cookies.

We are committed to complying with legislation changes for storing information on a user's computer or mobile device. We aim to be honest and clear about your privacy when using our website.



## Cookies that we use

Purpose	Cookie Provider	Cookie Name(s)	Duration	Essential?
Used by Google DoubleClick to register and report the website user's actions after viewing or clicking one of the advertiser's ads with the purpose of measuring the efficacy of an ad and to present targeted ads to the user.	DoubleClick.net	IDE	1 year.	No as we don't use Google ads.
To monitor number of visitors and how they interact with our website. / Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	<a href="https://analytics.google.com/analytics/web/">https://analytics.google.com/analytics/web/</a>	_ga	Persistent - 2 years.	Not for the user but it is essential for us to track use behaviour to improve website functionality in the future.
To manage the volume of page view requests made.	<a href="https://analytics.google.com/analytics/web/">https://analytics.google.com/analytics/web/</a>	_gat	Persistent - 10 minutes.	Not for the user but it is essential for us to track use behaviour to improve website functionality in the future.

Purpose	Cookie Provider	Cookie Name(s)	Duration	Essential?
To monitor unique visitors. / Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	<a href="https://analytics.google.com/analytics/web/">https://analytics.google.com/analytics/web/</a>	__gid	Persistent - 24 hours.	Not for the user but it is essential for us to track use behaviour to improve website functionality in the future.
Used to distinguish users and sessions. The cookie is created when the JavaScript library executes and no existing __utma cookies exists. The cookie is updated every time data is sent to Google Analytics.	<a href="https://analytics.google.com/analytics/web/">https://analytics.google.com/analytics/web/</a>	__utma	2 years.	Not for the user but it is essential for us to track use behaviour to improve website functionality in the future.
The AddThis cookie is associated with the share buttons on our news articles, where a user can share a link from an article to their friends.	addthis.com	__atuvc	2 years.	It is essential when providing the AddThis button for users to share content.
This cookie is set by Google and is used to help us identify trends to better tailor our website to our audience.	<a href="https://analytics.google.com/analytics/web/">https://analytics.google.com/analytics/web/</a>	amp__3a7o40ioz2j_contact_key__	30 seconds to 1 year.	Not for the user but it is essential for us to track use behaviour to improve website functionality in the future.

Purpose	Cookie Provider	Cookie Name(s)	Duration	Essential?
This cookie is set by Google and is used to help us identify trends to better tailor our website to our audience.	<a href="https://analytics.google.com/analytics/web/">https://analytics.google.com/analytics/web/</a>	amp__engagement__	30 seconds to 1 year.	Not for the user but it is essential for us to track use behaviour to improve website functionality in the future.
This cookie is set by Twitter and is used to remember your language preference. Tiedata allows Twitter to set this cookie so that Twitter content on tiedata.com is displayed in your preferred language.	twitter.com	lang	Until end of session.	It is essential for the Twitter feed to work properly.
Used to distinguish the users. It is installed on pages that display any Twitter button.	twitter.com	_ga	2 years.	It is essential for the Twitter feed to work properly.
Do not track from twitter.	twitter.com	dnt	10 years.	It is essential for the Twitter feed to work properly.
This cookie is set due to Twitter integration and sharing capabilities for the social media.	twitter.com	eu_cn	1 Year.	It is essential for the Twitter feed to work properly.
Used by Twitter to manage a session if the users have not accessed their Twitter account.	twitter.com	guest_id	2 years.	It is essential for the Twitter feed to work properly.

Purpose	Cookie Provider	Cookie Name(s)	Duration	Essential?
Twitter set a series of cookies on any page that includes a Twitter feed. For more information please check: <a href="https://support.twitter.com/articles/20170514">https://support.twitter.com/articles/20170514</a>	twitter.com	kdt	42 weeks.	It is essential for the Twitter feed to work properly.
Twitter set a series of cookies on any page that includes a Twitter feed. For more information please check: <a href="https://support.twitter.com/articles/20170514">https://support.twitter.com/articles/20170514</a>	twitter.com	personalization_id	1 year 7 months.	It is essential for the Twitter feed to work properly.
Twitter set a series of cookies on any page that includes a Twitter feed. For more information please check: <a href="https://support.twitter.com/articles/20170514">https://support.twitter.com/articles/20170514</a>	twitter.com	remember_checked_on	9 years.	It is essential for the Twitter feed to work properly.
Twitter set a series of cookies on any page that includes a Twitter feed. For more information please check: <a href="https://support.twitter.com/articles/20170514">https://support.twitter.com/articles/20170514</a>	twitter.com	tfw_exp	2 Weeks.	It is essential for the Twitter feed to work properly.

## ICO Registration

Our ICO registration number is Z8054288.

## Changes to this Privacy Policy

This privacy notice does not provide exhaustive detail of all aspects of our collection and use of personal information. However, we are happy to provide any additional information or explanation using the contact details at the beginning of this privacy policy.

We keep our privacy notice under regular review. This privacy notice was last updated on May 25, 2018.