



Document Date: 2018-05-24

Privacy Notice

Backbone (UK) Limited (Backbone, we, us or our) know that you take the privacy of your information and how it is used and shared very seriously, and we will only use your personal information in accordance with the current data protection law in the UK and this privacy policy. This notice describes our privacy policy and how we aim to repay the trust you have shown by sharing your personal data with us.

This policy applies to all the websites we operate, our use of emails and text messages for marketing purposes, and any other methods we use for collecting information. It covers what we collect and why, what we do with the information, what we won't do with the information, and what rights you have. This privacy policy only applies to personal information we hold about individuals. It does not apply to information we hold about companies and other organisations.

We may update this privacy policy from time to time by publishing the amended version on our websites. Unless we have legal grounds to do otherwise, we will provide you with at least 30 days' notice of the effective date of the revised privacy policy. We may post the notice on our websites and/or send you the notice by email.

Who we are

In this policy, whenever you see the words 'Backbone', 'we', 'us' or 'our', it refers to Backbone (UK) Limited. We are an IT service provider, offering a wide range outsourced IT services to small and medium businesses. For the purposes of the General Data Protection Regulation, we are a data controller in respect of the personal information that we collect and process about you as described in this privacy policy.

Our details are as follows:

- Legal company name: Backbone (UK) Limited
- Registered in England and Wales with company number 3583989
- ICO registration reference: ZA111258
- Email: privacy@backbone.uk.com
- Telephone: +44 203 130 9400
- Postal Address and Registered Office: 1892 Building, 47 Kingsway Place, London. EC1R 0LU.

If you have any questions about this privacy notice, including any requests to exercise your legal rights (see Your rights section below), please contact the Data Protection Owner using the details set out above.

Information we collect

We will only ever collect the information we need – including data that will be useful to help improve our services.

We may collect and process the following data about you:

1. Personal information, such as name, postal address, phone number, email address, that you provide by filling in forms on our websites, send us an email, or when you contact us via telephone and includes information provided when you:
 - a. subscribe to receive one of our newsletters;
 - b. order a brochure;
 - c. respond to a campaign;
 - d. enter a competition or promotion;



- e. submit a question to us or provide us with feedback.
 - f. use services from us and our strategic partners
2. Details of your visits to our sites including but not limited to, IP addresses (the location of the computer on the internet), pages accessed, and files downloaded. This helps us to determine how many people use our sites, how many people visit on a regular basis, and how popular our pages are. This is statistical data about our users' browsing actions and patterns and does not identify any individual. It simply allows us to monitor and improve our service.

You are provided with an opportunity to opt out from receiving communications from us or our partners at the time that your details are submitted and, on each occasion, that you are contacted thereafter. Our sites use cookies to distinguish you from other users of our sites. This helps us to provide you with a good experience when you browse our sites and allows us to improve our sites. If you want to disable cookies, please refer to your browser help.

How we use the information we collect

We may process your personal data for our legitimate business interests. "Legitimate Interests" means the interests of our company in conducting and managing our business and providing you with the best services and products in the most secure way.

These interests include:

- To ensure that content from our sites are presented in the most effective manner for you and for your computer;
- To provide you with information about our products, services, offers or technical developments that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- To contact you regarding your opinions on our products and services which may be used for marketing, research and analysis, where you have consented to be contacted for such purposes.
- To help us identify you when you contact or visit us.
- For general administration purposes.
- To help us improve the quality of our products and services
- To help us detect and prevent fraud and money laundering.
- To help us recover debts.
- To carry out analysis and customer profiling.
- When you communicate with us for customer service or other purposes (e.g., by emails, faxes, phone calls, tweets, etc.), we retain such information and our responses to you in the records of your account.

When we process your personal data for our legitimate business interests we always ensure that we consider and balance any potential impact on you and your rights under data protection laws.

If you have any concerns about the processing described above, you have the right to object to this processing. For more information on your rights please see "Your rights" section below.

Choice / opt-in and opt-out

Whenever the processing of your personal data requires your consent then you will be given the opportunity to opt-in or opt-out to having your contact details used as set out above, at the time your details are submitted.

For example, when you request product information, you can tell us when you provide your details if you do not want to receive any other information from Backbone or our partners, or you can let us know how best to get in touch with you with information that may be of interest.



Backbone (UK) Limited
47 Kingsway Place
London, EC1R 0LU
0203 130 9400
security@backbone.uk.com
www.backbone.uk.com

If you do not wish us to use your data as set out above, or to pass your details on to third parties for marketing purposes, please leave the relevant boxes, situated on the form which We used to collect your data, blank/unticked.

If you no longer wish to receive email or other promotional materials from us, you may opt-out of receiving these communications at any time by one of the following methods:

- by replying to the email with 'unsubscribe' in the subject line;
- by using the opt out boxes on the response form and submitting it;
- by writing to 1892 Building, 47 Kingsway Place, London. EC1R 0LU;
- by calling us on +44 203 130 9400.

Sharing your information

We may have to share your personal data with the parties set out below for the delivery of our services:

- Backbone BG EOOD acting as joint controllers or processors and who are based in the EU and provide coordinated service desk, support and project services.
- Strategic partners who provide products or services to Backbone (UK) Limited and our service providers and agents who perform services on our behalf for legitimate interests and contractual obligations to our customers.
- We may also disclose your personal information to other third parties, if we are under a duty to disclose or share your personal data for legal or regulatory purposes, in relation to existing or future legal proceedings, for the prevention of fraud/loss or to protect the rights, property, safety of Backbone (UK) Limited, our customers or data subjects.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Data security

Information is stored by us on equipment located in the European Economic Area (EEA). We may transfer the information to other offices and to other reputable third-party organisations as explained above – they may be situated inside or outside the EEA. Data transfers to the USA are under compliance of the EU-US Privacy Shield and any other data transfers to a third country outside the US and EEA requires your prior approval as the data controller. We may also store information in paper files.

Backbone have security protocols and policies in place to manage and record your data privacy and preferences correctly and that your data is stored securely to protect against its loss, misuse and alteration. Documentation can be supplied on request from our Data Protection Owner by emailing privacy@backbone.uk.com.

Backbone take steps to ensure that any businesses that we share your data with will have security protocols and policies in place to manage and record your data privacy and preferences correctly and that your data is stored correctly.

Unfortunately, the transmission of data across the internet is not completely secure and whilst we do our best to try to protect the security of your information we cannot ensure or guarantee that loss, misuse or alteration of data will not occur whilst data is being transferred.

We will keep your information only for as long as we need it to provide you with the goods, services or information you have required, to administer your relationship with us, to comply with the law, or to ensure we do not communicate with people that have asked us not to. When we no longer need



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information, we will always dispose of it securely, using specialist companies if necessary to do this work for us.

Job applicants, current and former Backbone employees

When individuals apply to work for Backbone, we will only use the information they supply to us to process their application and to monitor recruitment statistics. Where we want to disclose information to a third party, for example where we want to take up a reference or obtain a 'disclosure' from the Criminal Records Bureau we will not do so without informing them beforehand unless the disclosure is required by law.

Personal information about unsuccessful candidates will be destroyed or deleted.

Once a person has taken up employment with Backbone, we will compile a file relating to their employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to that person's employment. Once their employment with Backbone has ended, we will retain the file in accordance with the requirements of our retention policy and then delete it.

Your rights

Under the data protection legislation, you have the right to request copies of your data, request rectification of your data, request erasure of your data, object to us processing your data, the right to prevent your data being used for direct marketing, request us to restrict the process and where our systems allow, the right to access a copy of the information we hold about you (a subject access request).

If you wish to exercise any of these rights please contact the Data Protection Owner in writing at Backbone (UK) Limited, 1892 Building, 47 Kingsway Place, London, EC1R 0LU or by emailing privacy@backbone.uk.com clearly stating PRIVACY REQUEST in the email subject field.

For more information about your rights under the Data Protection Act contact the Information Commissioner's Office www.ico.org