

IT Resource Management Ltd Privacy Policy

1. Scope

All data subjects whose personal data is collected by IT Resource Management Ltd, in line with the requirements of GDPR using whatever means defined in this policy.

2. Responsibilities

2.1 The Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to IT Resource Management Ltd collecting/processing their personal data.

2.2 All Employees of IT Resource Management Ltd who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Privacy notice

3.1 Who are we?

IT Resource Management Ltd is the organisation who collects the personal data from www.itrm.co.uk and in turn makes it a data controller, IT Resource Management Ltd will use your data to help find the relevant product or service for yourself which in turn makes us also a data processor.

We may also already hold your data from previous interaction and where relevant, we will continue to do so under the legitimate interest basis of GDPR in that we have contractually engaged with you within in the last 3 years even if that contract is no longer in place. On this basis, we will hold your information and will contact you for consent before we use it for any other purpose than what we were given it for.

Any personally identifiable contact information that is for transactions or communication older than 3 years and where there is no basis for retaining, storing or processing that information, we will remove it from our systems throughout April, May and June 2018. If you disagree with us holding your information, please contact us and we will update your consent and act accordingly in the meantime.

Regards to why we collect the data and what we do with it, we will use your data to find out your requirements and if you are interested in items, products, events or services on the website or within our portfolio we will identify your requirements and provide you with an introduction to the most suited item, event, service or where relevant a 3rd party supplier where we may receive a commission for the introduction. We do develop Applications and Websites ourselves.

If you are interested in our any of our products, services or events we will use the details so we can process and service your request or when necessary, your order in house.



Our Data Protection Officer can be contacted directly here:

- Lewis Maslin
- Operations Director
- Lewis.maslin@itrm.co.uk
- 020 8308 3300

The personal data we would like to collect / process is:

- **Personal data type:**
 - **Source (where IT Resource Management Ltd obtained the personal data from if it has not been collected directly from you, the data subject. But not if the personal data has been accessed from publicly accessible sources):**
- **Contact Name :**
 - We will use this to service your enquiry or request and to ensure we are speaking to the correct person when we make contact.
- **Contact Number:**
 - We will use this to service your enquiry or request, we will call you so we can discuss your enquiry with yourself.
- **Contact Email :**
 - We will use this to service your enquiry or request, we will email details of the product, event or service you have enquired about.
- **Product Interested In :**
 - We will use this to service your enquiry or request, we will use this so the relevant person can deal with your enquiry or request ensuring you receive the best level of service.
- **Time Stamp & Date Stamp Of Enquiry or Request :**
 - We will use this to service your order and for compliance to ensure we can provide proof of enquiry or request made.
- **IP Address Enquiry Made On :**
 - We will use this for compliance to ensure we can provide proof of enquiry or request made where relevant.
- **If You Want To Be Contacted In The Future And How :**
 - We will use the information to contact you in the future and only contact you by the methods you choose.

The personal data we collect will be used for the following purposes:

- We will use your data to help us service your enquiry or request.
- We will use your data to help us manage any service you take out with us.
- If you opted in for marketing or events in the future regarding new products or services we offer we will only contact you on your preferred method with details of new products, services, events or news from IT Resource Management Ltd such as a newsletter.

Our legal basis for processing for the personal data:



- If you decided to enter into a business agreement with IT Resource Management Ltd under the contract we will need to process your details to service your order and services that we provide to you.

The special categories of personal data concerned are:

We do not process any special categories. We have included a list of what these categories are for your records under GDPR.

- Racial
- Ethnic origin
- Political opinions
- Religious beliefs
- Philosophical beliefs
- Trade union membership
- Genetic data
- Biometric data
- Health data
- Data concerning a natural person's sex life
- Sexual orientation

3.2 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for IT Resource Management Ltd to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used. You may withdraw consent at any time by going to the opt out page on our website where you can do this via a contact form, which is found [here](#).

3.3 Disclosure

IT Resource Management Ltd will not pass on your personal data to third parties without first getting your explicit consent or advising you during the sales process and at the point of sale that a service we provide requires us to do so.

3.4 Retention period

IT Resource Management Ltd will process personal data for the length of any agreement we have in place to manage a service we provide, if we can't or you choose not to take out a service we provide you with we will destroy your details unless you have opted in for further contact in regards to new products, services, events or news from IT Resource Management Ltd we will always provide you with the opportunity to opt out on all future correspondence such as email opt in/out.

We have come to agreement on this 3 year time period as we believe this is how long we need the data to service the client's needs post contract agreement and in regards to how long we hold data where client opted in for further contact we will retain this until the client chooses to opt out as they will be given the option to do on all correspondence. We will also make contact every 12 months with the client asking them to re opt in if they do not respond or say no we will destroy their details if no legitimate interest exists.



3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access
 - you have the right to request a copy of the information that we hold about you.
- Right of rectification
 - you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten
 - in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing
 - where certain conditions apply to have a right to restrict the processing.
- Right of portability
 - you have the right to have the data we hold about you transferred to another organisation.
- Right to object
 - you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling
 - you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review:
 - in the event that IT Resource Management Ltd refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data as a Subprocessor to IT Resource Management Ltd.

3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by IT Resource Management Ltd (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and IT Resource Management Ltd's data protection representative/ Data Protection Officer.

The details for each of these contacts are:

Data Protection Officer

- Lewis Maslin
- Operations Director
- Lewis.maslin@itrm.co.uk
- 020 8308 3300

Information Commission officer (ICO)

- Wycliffe House, Water Ln, Wilmslow, SK9 5AF
- <https://ico.org.uk>
- casework@ico.org.uk
- [0303 123 1113](tel:03031231113)



3.7 Privacy statement

Read more about how and why we use your data below.

We will communicate with you in any one of the following ways:

- Face to Face / in person
- By Phone, be that mobile or landline
- By Email
- By SMS Text
- By Letter

As a currently contracted customer:

We will use your name, email address, mobile phone number, office number and your role or title to reach you when it is pertinent to do so and we have your prior consent to use one of our methods of communication.

Other information may be stored but this will be on the basis of legitimate interest.

As a known business contact, communicated with in the last 3 years:

We will use your name, email address, mobile phone number, office number and your role or title to reach you when it is pertinent to do so and we have your prior consent to use one of our methods of communication.

As a third party supplier, advisor or affiliate:

We will use your name, email address, mobile phone number, office number and your role or title to reach you when it is pertinent to do so and we have your prior consent to use one of our methods of communication.

Other information may be stored but this will be on the basis of legitimate interest.

As an Employee:

We will use your name, email address, mobile phone number, office number and your role or title to reach you when it is pertinent to do so and where this isn't for the purpose of your employment, we will ask for your prior consent to use one of our methods of communication for that purpose before any activity commences.

Other information may be stored but this will be on the basis of legitimate interest.

4. Online privacy statement

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

IT Resource Management Ltd - How we use your information

This privacy notice tells you how we, IT Resource Management Ltd, will collect and use your personal data as follows



- **Visitors to our website(s)**

When visitors arrive on www.ITRM.co.uk we use a third party service, which is google analytics, to collect from you basic internet log information and information on your behaviour patterns while you are on the site. This information lets us know how many visitors come to the site and what pages they are looking at and the amount of time they spend on certain pages. The information collected cannot identify anyone and we ensure ourselves and google do not use this information to identify an individual of someone who has or is visiting our site. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it and gain your consent through an affirmative action such as 'click the approval box to continue'.

- **How www.ITRM.co.uk (IT Resource Management Ltd) use Cookies**

You can learn more about our cookie policy on the link on our website www.itrm.co.uk.

- **E-newsletter**

We will send out a newsletter to people who have explicitly expressed they want to be contacted with a newsletter and selected email or Letter as their communication preference for receiving this by selecting the relevant box(s) on our website based form.

- **Security and performance**

We use a third-party programme to protect our website from malicious malware and attacks which means it will check your IP address on arrival.

- **People who contact us via social media**

We will contact you back on the platform you contacted us and we would always request explicit consent if you wanted us to send an email or contact you via phone.

- **Inbound Calls to Our Office Number**

We will collect your calling line identification (CLI) along with the staff member you speak to, may create a file on our MSP platform (CRM function) where we will collect personal information but you will be made fully aware by the staff member of this happening and only with your consent will this be captured, this will only be collected to help with your enquiry.

- **USES MADE OF THE INFORMATION**

We use the information held about you in the following ways:

- Information you give to us. We will use this information to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products, events and services you request from us, to notify you about changes to or to make suggestions and recommendations that may interest you about our range of products or services, or to ensure that content from our site is presented in the most effective manner for you and for your chosen device, be that smartphone, tablet, desktop or laptop computer or remote desktop server (including VDI).

Information we collect about you. We will use this information:

- to administer our site and for internal operations including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our services, event or products, when you choose to do so;
 - as part of our efforts to keep our site safe and secure;
 - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;



- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

Why does IT Resource Management Ltd need to collect and store personal data? In order for us to provide you with a service, event or product. The services we provide are as follows.

- IT Support Services
- IT Advisory & Consultancy Services
- Voice & Data Services
- Application and Website Development
- Network and Electrical Cabling
- Hosting Services including IaaS, PaaS, SaaS
- Cloud Backup and Disaster Recovery
- IT Security Services

We need to collect personal data for correspondence purposes and servicing the client's enquiry and to ensure we can provide any services that the client requested. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes IT Resource Management Ltd would contact you for additional consent before any activity were to commence.

Will IT Resource Management Ltd share my personal data with anyone else?

We will only pass your personal data on to a third-party service if you provide us with explicit consent or we have advised you about it during the sales process and you have committed to the contract knowingly. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide to us or directly to you. We may have no affiliation to the service they provide but may receive a commission for the introduction. When they no longer need your data to fulfil this service, they will dispose of the details in line with IT Resource Management Ltd procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

How will IT Resource Management Ltd use the personal data it collects about me?

IT Resource Management Ltd will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. IT Resource Management Ltd is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will IT Resource Management Ltd contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that the organisation holds about me?

IT Resource Management Ltd at your request, can confirm what information we hold about you and how it is processed. If IT Resource Management Ltd does hold personal data about you, you can request the following information:



- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer at IT Resource Management Ltd, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of IT Resource Management Ltd or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely will be made available. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing where relevant.

What forms of ID will I need to provide in order to access this?

IT Resource Management Ltd accepts the following forms of ID when information on your personal data is requested:

Valid Passport or Valid photo driving licence & a proof of address (utility bill – from last 3 months)

If you can't provide a passport or driving licence we will accept a birth certificate with some form of photo ID & proof of address in the last 3 months.

Contact details of the Data Protection Officer / GDPR Owner:

- Lewis Maslin
- Operations Director
- Lewis.maslin@itrm.co.uk
- 020 8308 3300