

THE DCS GROUP

DATA PROTECTION POLICY

LAST UPDATED – 23/05/2019

KEY DETAILS

Policy prepared by:	Robert Thompson
Approved by Board/Management on:	24/05/2018
Policy became operational on:	24/05/2018
Last review date:	23/05/2019
Next review date:	23/05/2020

INTRODUCTION

At the DCS Group which includes Digital Copier Systems Limited, Mend My Computer Limited and Base 16 Limited (hereinafter 'The DCS Group') we are committed to protecting and respecting your privacy in accordance with the data protection legislation known as the General Data Protection Register (GDPR). This legislation is effective from the 25th May 2018, and we are committed to review our policy annually or where operational procedures require us to do so.

These include but are not limited to:

- The data we hold: How we use it: Why we need it: Who has access to it:
- What your rights are: Details of who to contact with any queries.

This Privacy Policy sets out your rights under the new legislation. We recommend that you keep up to date with our privacy policy by visiting our website on a regular basis.

BACKGROUND

The DCS Group needs to gather and use certain information about individuals for the purpose of its business operation.

These can include customers, suppliers, business contacts, employees and other people in the organisation that have a relationship with The DCS Group or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards – and to comply with the law.

WHY THIS POLICY EXISTS

This data protection policy ensures that The DCS Group:

- Complies with data protection law and follows good practices
- Protects the rights of staff, customers and partners
- Is open about how it stores and processes individuals' data
- Protects itself from risks of a data breach.

PERSONAL INFORMATION WHICH WE COLLECT

We collect personal information about you (and others if their personal information is provided by you) when you engage in any of the following (but not limited to):

- (a) Purchase a product from The DCS Group;
- (b) Register or alter details for an account with The DCS Group;
- (c) Sign up for our newsletter and other marketing emails (in line with Marketing below);
- (d) Enquire about or request a quotation for products/services; engage with us to receive helpdesk services (such as by contacting our customer services department, through the 'contact us' form on our website or by calling our telephone line;
- (e) Post material to our website and/or social media page;
- (f) Complete customer feedback or surveys

(g) Raise a complaint or dispute with us

(h) Speak to one of our representatives;

The personal information collected in the above manner may include the following about you (and others if their personal information is provided by you):

(a) Full name;

(b) Postal address;

(c) Email address;

(d) Telephone number;

(e) Payment details;

(f) Geo-location;

(g) Machine identifiers (such as IP addresses);

(h) Dispute resolution information;

(i) Disability and health information;

(j) Image data;

(k) Behavioural data (tags and cookies – see Cookies and Tracking section below);

PERSONAL INFORMATION PROVIDED BY THIRD PARTIES

We may receive information about you from other sources (such as credit reference agencies), which we will add to the information we already hold about you in order to help us provide our products and services in accordance with your requirements and to ensure that the quality of data we have on your account(s) is maintained properly. We may also obtain information about you from social media providers such as Twitter and Facebook or from third party websites where you have left commentary or feedback about us.

HOW WE USE YOUR INFORMATION

- 1) In order to take the necessary steps in preparation of, or to fulfil our obligations under a contract:
 - a) Products and payments – provide communications about products and services being provided to you (and others if their personal information is provided by you);
 - b) Order updates – send details of new, amended or cancelled orders and changes;
 - c) Update you on matters affecting your order – contact you (and others if their personal information is provided by you) in the event of a change that affects a delivery or any data or personal information you have provided us with, such as changes to terms and conditions of order or this privacy policy;
 - d) Website service communication – provide notifications of any changes to our website or to our services that may affect you (and others if their personal information is provided by you);
 - e) Customer service communication – provide you with requested information or correspondence, such as a response from us to an enquiry made by you;

- f) Maintain your business account with The DCS Group – create a profile about you in relation to your order(s), to update our records, create and maintain your account.
- 2) With your consent:
- a) Marketing communications – create a profile about you for marketing purposes to tailor our communications to you. We may use an automated process to do this;
 - b) Promotional offers – inform you about promotional offers and other products or services that may be of interest (in line with Marketing communications above);
 - c) Maintain records indicating your consent to status – to ensure we accurately reflect your wishes when communicating to you.
- 3) In our legitimate interest* improve our services:
- a) Market research – to contact you (and others if their personal information is provided by you) to ask about the experience using our products and services as part of a continual programme of customer service improvement. This is not marketing communication this is separate to Marketing communication above. We may use third parties to provide such market research communications to you on our behalf.
 - b) Website customisation – to customise our website and its content to your particular preferences in accordance with the Cookies and Tracking section below;
 - c) Customer support – monitor calls and help train staff in relation to our customer and helpdesk function;
 - d) Product and service improvement – to improve our product and services;

- e) Service analysis – to conduct research, statistical analysis and behavioural analysis. This may include providing aggregate statistical information relating to customers, sales, traffic patterns and related site information to reputable third parties.

- 4) In our legitimate interest* to protect against fraud:
 - a) Website improvement and fraud prevention – improve our websites, prevent or detect fraud or abuses of our websites and enable third parties to carry out technical, logistical or other functions on our behalf;

 - b) Security – carry out security checks when allowing you access to our services and to block fraudulent or suspected fraudulent activity.

- 5) In order to meet our legal obligations:
 - a) Taxation – ensure we meet our tax and other regulatory obligations;

 - b) Registration – ensure local jurisdiction regulations are complied with (where registration is necessary in such jurisdictions).

*any reliance or legitimate interest shall not prejudice your interest or fundamental rights and freedoms.

We process this data based on our legitimate interest to run The DCS Group in an efficient and proper way for the benefit of our customers. This includes managing our financial position, planning, audit, communications, business capability and to exercise our rights set out in agreements and contracts. We also process your personal data where required to comply with laws and regulations that apply to us.

MARKETING

We may periodically send promotional material to you about new products, special offers or other information which we think you may find interesting based on the profile we have created about you to the email addresses and phone numbers which you have provided.

If these are similar to products, services and orders previously supplied by us to you, we will assume, under our legitimate interests to promote similar goods and services, that you are willing to receive this information unless you tell us otherwise. Please note that we do not want to send you information that you do not want to receive and you can opt out at any time (please see 'The right to ask us to stop contacting you with direct marketing' below for further information).

We will always ask your permission before sending you email marketing information. We do this by asking for your positive confirmation (e.g. by providing a tick or inserting your contact details in the relevant boxes) indicating that you wish to receive marketing and you can opt out at any time (please see 'The right to ask us to stop contacting you with direct marketing' below for further information). This ensures you only receive information that you have given us permission to send and are willing to receive.

We may use your information to create a profile about you in order to tailor, by automated means, our communication and marketing to you. You can object to such profiling, please see 'The right to object to automated decision making/profiling' below).

From time to time, we may also use your information to contact you for research purposes and/or to ask about your experience using our services as part of a continual programmed of customer service improvement. We may contact you by email, telephone, text, social media and/or mail. We may also use the information to customise the website according to your interests.

HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

We retain your information for a range of purposes which determine the period of time for which we need to keep such information. For example (list is not exclusive):

Data Retention Period

For the purpose of marketing	5 years from the point of last contact with you, this may include use of our websites, orders or responses to communications with you
Financial records	7 years

For compliance with legal obligations arising from contracts entered into with you for example tax regulations.

For compliance with legal obligations arising from contracts entered into with you, for example tax regulations. We will remove your data from our systems at the end of the applicable data retention periods, unless we are required by current or future law to retain your person information for a longer period.

OUR APPROACH TO INFORMATION SECURITY

To protect your information, The DCS Group has policies and procedures in place to make sure that only authorised personnel can access the information, that information is handled and stored in a secure and sensible manner and all systems that can access the information have proportionate and reasonable security measures in place. To achieve this, employees, contractors and third-party suppliers have contracts, with defined roles and responsibilities.

While we take commercially reasonable measures to ensure the safety and security of your data, due to the inherent risks with the internet, we are unable to warranty the absolute security of your data when using our services.

YOUR RIGHTS

In order to process any of the requests listed below, we may need to verify your identity for your security. In such cases your response will be necessary for you to exercise this right.

The right to access information we hold about you

At any point you can contact us to request details concerning the information we hold about you, why we have the information, who has access to the information and where we got the information. In most cases you may be entitled to copies of the information we hold concerning you. Once we have received the request we will respond within 30 days.

The right to correct and update the information we hold about you

If the data we hold about you is out of date, incomplete or incorrect, you can inform us and we will ensure that it is update.

The right to have your information erased

If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request, we will confirm whether the data has been deleted or tell you the reason why it cannot be deleted.

The right to object to processing of your data

You have the right to request that The DCS Group stops processing your data. Upon receiving the request, we will contact you to tell you if we are able to comply or if we have legitimate grounds to continue. If data is no longer processed, we may continue to hold your data to comply with your other rights.

The right to ask us to stop contacting you with direct marketing

You have the right to request that we stop contacting you with direct marketing. On promotional email we provide an 'unsubscribe' link at the bottom of the email which will unsubscribe you from that service.

The right to object to automated decision making/profiling

You have the right to request that we stop profiling you in relation to our direct marketing practice. You can inform us and we will deal with your request accordingly.

The right to complain

You can make a complaint to us by contacting us via datacontroller@thedcsgroup.co.uk or to the data protection supervisory authority – in the UK, this is the Information Commissioner’s Office, at <https://ico.org.uk/>

CONSENT

In those cases where we need your consent to process your information, we will ask you to make a positive indication (e.g. to tick a box or insert your contact details on the relevant form or web page requiring consent, or to pass on your company contact information to one of our representatives on a face to face basis). By actively providing us with your consent, you are stating that you have been informed as to the type of personal information that will be processed, the reasons for such processing, how it will be used, for how long it will be kept, who else will have access to the it and what your rights are as a data subject and that you have read and understood this privacy policy.

CONTACT DETAILS

If you have any queries about this policy, need further information or wish to lodge a complaint you can use the details below to contact us.

Data Protection Officer
The DCS Group
DCS House
Callows Lane
Kidderminster
Worcestershire
DY10 2JG

Datacontroller@thedcsgroup.co.uk

CHANGES TO THIS PRIVACY POLICY

We may change this policy from time to time. You should check this policy occasionally to ensure that you are aware of the most recent version that will apply each time you access the website.