

4Cambridge - GDPR Privacy Notice

4Cambridge Ltd is an IT support and services business based in Cambridge in the United Kingdom (EU) and was established in 2017. As an organisation we provide a range of IT related services to clients, including hardware and software support, network management, security and data protection advice, IT consultancy, and the provision of hardware, software and cloud services.

Information Officer

You can contact our designated Information Officer for any GDPR related enquiries on:

Email: gdpr@4cambridge.co.uk

Tel: 01223 455 000

The data we will process on your behalf includes:

- Name
- Company name
- Company address
- Contact telephone number(s)
- Email address
- IP address (for support reasons)
- Usernames and passwords (for support reasons)
- Invoice address
- Account details
- Direct Debit details

Our Legal Basis for Processing your Personal Data

We will process your data securely under the following legal basis:

- We require a name, address, telephone number, email address for secure identification and correspondence during your working relationship with us.
- We require contact details to inform you of any IT related issues, and to respond to any IT support requests that you make.
- We require username, password, IP address and network information to allow us to carry out the required support work on your data network.
- We require your invoice and/or direct debit details to allow us to charge the agreed price for the support and services you receive

Legitimate interests pursued by us or third parties we use, are as follows:

- Your contact details may be shared with some third parties who provide services to you via our partner arrangements. These details are not shared except where required for the configuration and delivery of the services being provided.

Special Categories of Personal Data

- We do not store any 'special' personal data such as driving license, passport, or national insurance number.
- We may ask to 'view' an item of 'special' personal data if being asked to hand over sensitive data and we are required to identify an authorised recipient in order to prevent a data breach

Disclosure

4Cambridge Limited will not pass on your data to third parties without first obtaining consent. The following third parties may receive your personal data for the following purposes as a part of our processing activities:

Third Party	Country Data is located in	Safeguards in place to protect your Personal data:	Retrieve a copy of your safeguards here:
Microsoft (Office 365 and Azure)	EU	Encryption and Password Policies	https://privacy.microsoft.com/en-us
Solarwinds (Online Backup, System monitoring)	UK	Encryption and Password Policies	https://www.solarwindmsp.com/legal/general-data-protection-regulation
Ingram Micro (Cloud Service licencing)	EU	Encryption and Password Policies	http://www.ingrammicrocloud.co.uk/gdpr/
Autotask (Support ticketing)	UK	Password policies	http://www.autotask.com/gdpr-compliance
IT Glue (System documentation)	US/EU	Encryption and Password Policies	https://itglue.com/privacy-policy/
Xero (Accounting records)	NZ/US	Passwords	https://www.xero.com/content/dam/xero/pdf/GDPR/Xero-Data-Processing-Addendum.pdf
Teamviewer (remote connections)	EU	Passwords, Whitelisted IPs and 2FA	https://www.teamviewer.com/en/privacy-policy/
GoCardless (payments)	EEA	Password policies	https://gocardless.com/privacy/
Wasabi (backup storage)	EU	Encryption and Password Policies	https://wasabi.com/legal/data-processing-addendum/

Retention Policy

4Cambridge Limited will process personal data for a maximum of 7 years to coincide with HMRC and accounting records. The exception being IT related configuration data which, in the event of a client moving to an alternative support provider, will be permanently deleted for security reasons.

Your Rights as a Data Subject

As a data subject, you will 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 4Cambridge Limited 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 below.

All of the above requests will be forwarded on should there be a third party involved in the processing of your personal data.

Any Subject Access Requests should be made either in writing to our office, via email to gdpr@4cambridge.co.uk or by calling on 01223 455 000.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by 4Cambridge Limited (or its third parties), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority which is the ICO (www.ico.org.uk).

You can report a concern directly with the ICO, if 4Cambridge Limited fails to handle your complaint in an appropriate manner: <https://ico.org.uk/concerns/>

Please send any initial complaints in writing to our office, via email to gdpr@4cambridge.co.uk or by calling on 01223 455 000.

Specific 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”.

How we use your information online

This privacy notice tells you how we, 4Cambridge Limited, will collect and use your personal data for from our secure contact form which will refer to this policy for consent that you allow us collect personal data, for example: name, email and contact telephone. Your data will be processed for contact purposes only.

Why does 4Cambridge Limited need to collect and store personal data?

To allow us to provide you any level of service we need to collect personal data for correspondence purposes. 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.

Where 4Cambridge provide existing services to you, we will occasionally send you information on related services which are relevant to the services and systems we have supplied to you. In terms of being contacted for other marketing purposes 4Cambridge Limited would contact you for additional consent, unless you have previously ticked the consent option on our contact form.

Will 4Cambridge Limited share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to 4Cambridge Limited in the course of dealing with you. 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 you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with 4Cambridge Limited's 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 4Cambridge use the personal data it collects about me?

4Cambridge Limited 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. 4Cambridge Limited 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.

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?

4Cambridge Limited, at your request, can confirm what information we hold about you and how it is processed. If 4Cambridge Limited 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, 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 4Cambridge Limited 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.

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.

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

4Cambridge Limited accepts any of the following forms of ID when information on your personal data is requested:

- Passport
- Driving licence
- Another form for ID which leaves no doubt of the data owner