

Apollo I.T. Ltd Privacy Policy

Summary

At Apollo I.T. Ltd, we understand the importance of taking good care of your information and ensuring you have maximum control and visibility of it.

If you'd like to access information we have in your name, amend or delete any information please contact us on 01803 444555. Our DPOs (Data Protection Controllers are Apollo's directors - Michael Freeman, and John Hayward) We're ISO9001 accredited and have specific procedures to deal with your request (and the remainder of this document).

IF YOU DO NOT ACCEPT AND AGREE WITH OUR PRIVACY POLICY THEN YOU MUST NOT USE APOLLO'S SERVICES

Apollo I.T. Ltd (Apollo, "we", "us", and "our") will always uphold high ethical and procedural standards towards your privacy at all times. Information contained in our privacy policy informs you of the way in which your Personal Data (defined underneath) you provide us (or we collect from you) will be used.

This Policy complements Apollo's Terms and Conditions, found at <https://terms.apolloit.co.uk>.

When you appoint Apollo's services, you agree to our privacy policy and you consent to our collection, storage and use of your Personal Data for the purpose of delivering our obligations to you.

For the purpose of Data Protection, any Personal Data you or any of your users/associates submit to Apollo, you will be the data controller and we will be a data processor of this personal data.

PERSONAL DATA WE MAY OBTAIN FROM YOU

"Personal Data" is information relating to an identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, 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.

We may obtain and use the following Personal Data about you and anyone you chose to add to our platform:

- Your billing details (using our accounts platform)
- Your payment history and payment method/mandate details (using our payments collection platforms)
- Your correspondence details (in our helpdesk system)
- Previous correspondence for quoting and works carried out (in our helpdesk system, and in our email server) with you, your employees, colleagues or associates
- Any services we resell/provide to you will include your personal details on that platform (usually on secure supplier websites – where we administer and manage your services from)
- And equipment left in our premises may contain your personal information (for example, a computer for repair will be backed up, and the backup held for 30 days to aid technical recovery in the event of a issue/mishap)
- Further details can be found in Apollo's Personal Data Register (ISO form R20)

Data and information you or your associates submit to Apollo might include email addresses,

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IP addresses, residential addresses, dates of birth, usernames and passwords, telephone numbers, survey responses.

All data submitted to Apollo may contain Personal Data and potentially Sensitive Personal Data of individuals. Sensitive Personal Data is defined as data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic or biometric data, data concerning health, data concerning sex life or sexual orientation and data concerning the commission or alleged commission of any offence.

You have the right to offer Apollo Personal Data (including Sensitive Personal Data, if applicable) for the purpose of receiving our services, and you are solely responsible for obtaining all required consents, authorisations and permissions from any third parties - and providing all required notifications to third parties.

It is your responsibility to ensure that third parties of whom you are submitting data on the behalf of - are aware of this Privacy Policy and also accept Apollo's Terms and Conditions. You may not provide Apollo with the personal data of third parties unless and until you have obtained all necessary consents, authorisations and permissions to do so.

BROWSING OUR WEBSITE, COOKIES AND IP ADDRESSES

We may obtain information about your computer when browsing our website, which includes your IP address, browser type and operating system where available. This data is used to assist system administration only.

We may also collect information regarding your browsing activity and interests through use of a cookie file. This cookie file is stored on the hard

drive of your computer, and contains information that is transferred to your computer's hard drive. We use the collection of this data to help us improve the experience of users on our website and service using Google Analytics.

We use Google Analytics to collect information about how visitors use the Site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. For more information about Google's privacy policy, please visit <https://www.google.com/intl/en/policies/> If you do not wish to allow the use of Google Analytics cookies at all, Google provides an opt-out plug-in for most common website browsers <https://tools.google.com/dlpage/gaoptout>

WHERE WE STORE PERSONAL DATA

The Personal Data we obtain from you will be stored mainly in our secure network in Dartmouth. Where we store your information in the cloud (for the delivery of agreed services) – these servers are within the EU.

We store your personal data you and your associates provide us with on our secure servers. In the event of us giving you or your Users (or you/they choosing) a password which grants you/them access to specific areas within our Website or Service, it remains your/their responsibility to maintain the confidentiality of this password. This includes the responsibility to refrain from sharing your/their password with other parties.

Apollo's staff members may, among other things, be involved in the processing of payment details, the provision of support services.

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As the transmission of data via the Internet cannot be assumed completely secure, we cannot guarantee the security of any of your or your associates data transmitted to our systems or Service; you are therefore responsible for any risk associated with such transmission. We will however at all times take all reasonable steps to ensure the transmission of your data is executed as securely as possible, and upon receipt of your/their data we will continue at all times to enforce strict security procedures and features in an attempt to prevent any unauthorised access.

HOW WE PROTECT YOUR PERSONAL DATA

We will take all reasonable steps in mitigation and prevention - to maintain appropriate technical and organizational measures to protect the Personal Data you provide to us against accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to your Personal Data.

HOW WE USE YOUR PERSONAL DATA

Personal Data we hold about you and your associates may be used in any of the following ways:

- To provide you and your associates with Apollo's Support services, including administration and management of your account/systems/services.
- To provide you and your associates with remote support.
- For research and analytics purposes (for example, to improve the quality of the Service). This may include an optional survey.
- To ensure security for you, your associates, our staff and other clients of Apollo.

- To comply with applicable Laws, court orders, government and law enforcement agencies' requests.
- To send you further information about our services for which we think you may have an interest.
- To send you further information about our services based on a request we have received from you. For example, with quoting or specifications.
- To inform you of any material risk to your operations which we have identified and see it as essential communications. This includes Data Protection information, and other possible threats affecting you and us.
- To assist in the recovery of your computer data.
- To fulfil obligations, we have in relation to any contracts we have in place with you (including, without limitation, any service level agreements and Ts and Cs).
- To provide you with notification about any changes to Apollo's service.

DISCLOSURE OF YOUR INFORMATION

Disclosure of your and your associates Personal Data (including, without limitation, client information) to third parties will only occur in any of the following events:

- We sell or purchase any business or assets. In such case, we may authorise the disclosure of your personal data to prospective sellers or buyers of such business or assets.
- All or the substantial majority of our assets are sold to a third party. In such case, your personal data may be one of the transferred assets.
- We are required to disclose your or your Users' personal data in order to fulfil any legal obligation, to enforce our contracts, T's and C', or to protect the

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property, rights or safety of Apollo or other parties. In such case, information may be exchanged with third party companies or organisations in order to prevent fraud or reduce credit risk.

- You acknowledge and agree that we may also disclose Personal Data (including, without limitation, Client Data) with: (i) our service providers involved in the provision, distribution, delivery and support of Apollo services, including the storage of any Client Data; (ii) fraud prevention agencies; (iii) law enforcement agencies, regulators, courts and public authorities; and (iv) emergency services.

Our service providers have to follow our express instructions when processing the personal data you or your associates have provided us, and must have in place appropriate technical and organisational security measures to safeguard such Personal Data, and we do not allow them to use this information for their own commercial purposes. All privacy policies of our suppliers are documented in Apollo's Personal Data Register (ISO form R20)

YOUR RIGHTS AND SUBJECT ACCESS REQUESTS

You retain the right to request us to refrain from processing your data for the purposes of marketing. To exercise such right, you may reply to any information we send you, detailing your request that we refrain from sending any marketing correspondence. If at any time we intend to use your data for such marketing purposes however, it is standard practice for us to make you aware in advance of collecting such data.

You retain at all times the right to access / amend / delete any Personal Data we hold about you or to exercise your right of data portability or to object to, or restrict, the

purposes for which your Personal Data is processed on certain grounds. You may exercise this right by making a request in accordance with Data Protection Laws, by calling us on 01803 444555. You may also lodge a complaint with the UK data protection regulator, the Information Commissioner should you be dissatisfied with the way that we handle your Personal Data.

You undertake to notify your associates of this privacy policy and of their rights under the Data Protection Law. We will provide you with reasonable assistance to enable you to comply and respond to a request, query or complaint from anyone in relation to their personal data.

HOW LONG WE KEEP PERSONAL DATA FOR

We will keep your and your Users' Personal Data for the duration of the Service and in accordance with your instructions or for such periods as may be required by law. Where we have made a backup of your system to mitigate data loss, we shall undertake to remove this data from our servers within 30 days from job closure.

CHANGES TO OUR PRIVACY POLICY

If at any time we make a change to this policy, we will update this page to reflect such change. We link to this page when we open a helpdesk support ticket on your behalf, and we recommend you review this page periodically to ensure you remain happy with the latest version.

QUESTIONS, COMMENTS AND GETTING IN TOUCH

We welcome any questions or comments in relation to this privacy policy, and advise you call us on 01803 444555 and ask to speak to an Apollo data processing officer.

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Details on how we plan to achieve each of these Objectives have been documented and can be found in Apollo's ISO 9001:2015 manual **M29 GDPR and Data Handling.**

Authorised By: Michael Freeman (Data Protection Officer)

Title: Director

Review Date: 01/05/2019