

Contents

Security and performance	2
How we use your information	2
Visitors to our website.....	2
Cookies	3
Services	3
Support	4
Email	4
Complaints.....	4
Your rights	5
Access to personal information and the excising of rights.....	5
Disclosure of personal information	5
Personal information retention.....	6
Complaints or queries about data protection	6
Links to other websites.....	6
Changes to this privacy Policy	6
How to contact us.....	6

Security and performance

We are 4s Systems Limited, company registration number 3124016, located at Shepperton Studios, Studios Road, Shepperton, TW17 0QD, UK.

We take protection of information, both personal and otherwise, very seriously. We maintain the security and performance of our data storage and handling systems through network access and procedural/management controls implemented and maintained by our staff, under the instruction of our Operations Director. Our website is maintained on our behalf by Aspect Media International Ltd.

With regards to personal information, we have carried out assessments of the legal basis for processing this data, and conclude that this is necessary on the grounds of contractual and legal obligations, and our legitimate interests for the use of client/supplier data for our commercial operations, and employee data for employment purposes.

How we use your information

This Privacy Policy tells you what to expect when we collect and process your personal information. For professional personal information (e.g. business-related) the legal basis for this is our legitimate interest, namely the control and maintenance of our website and/or normal business administration activities and/or the creation and performance of a contract between you and us. For employment-related personal information, the legal basis for this is our legitimate interest, namely the protection and assertion of legal rights and/or the performance or creation of a contract between you and us as an employer, and/or employment, fiscal and other legal obligations.

We will not store any of your information outside of the European Economic Area [EEA]

Should we need to process any personal information for a purpose other than that for which it was originally collected, we will provide you with information on that other purpose prior to that further processing, allowing you time to consider our request and consent to it, or ask for more information.

Visitors to our website

When someone visits our website we collect standard internet logging information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site, which links are followed, etc. This information is processed in a way which does not identify anyone. We do not attempt to discover the identities of those visiting our website.

Information you enter onto the contact form on the website is sent by email to our Directors to enable your query to be answered. Your information may be passed to other company managers or staff in order to provide you with the information you have requested. The information you provide is not shared with or processed by any other person or company. Your information may be stored within the email received from the website (the information you entered into the contact form), and replies from us to you. These emails will not normally be deleted unless you request us to do so.

By continued use of our website, you consent to the Company collecting analytical and professional information about you and your organisation as described above and in accordance with the terms set out in this Policy. You also consent to the Company using the analytical information (that does not identify you) for market research, marketing, sales, customer relationship management purposes, and the professional/personal information that you provide to us in the contact form for operational purposes to provide the information that you have requested.

We will not use any data other than for the purpose it was provided to us.

Cookies

Please be aware that we use a number of Google Analytics cookies on our site. These cookies are used to collect information about where visitors to our website come from (using your IP address, this is known as IP geolocation), which pages on the website visitors go to, and which links are followed. Although the Google Analytics cookies may store your IP address and send this to Google where we can access the location information, we and Google cannot identify you, or anything about you, from this data.

If you are not happy for these cookies to be created, then you should not use this website. Alternatively, you can use your web browser's privacy controls to delete the cookies after your visit.

If you do not know what cookies are, or how to control or delete them, then we recommend you visit www.aboutcookies.org for detailed information, and read the Help information for your web browser.

The following table describes the cookies created on our website and what they are used for.

Cookie name	Purpose
<i>Google (Analytics)</i> _ga _gid _gat _utma _utmb _utmc _utmz	<p>These cookies are used to collect information about how visitors use our site. We use the information to help us improve the site and visitor experience. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from, the pages they visited and links they followed.</p> <p>More information can be found here: Google Analytics Privacy Policy and Google Analytics Cookie Usage on Websites</p>

Cookies will be retained on your computer in accordance with the expiry times shown on the Google Analytics Cookie Usage page linked above.

Services

We offer various services to commercial organisations and individuals. To provide our services we need to obtain and hold certain data for normal business operational purposes (e.g. contract, financial, service provision). However, we only use these data to provide the requested service and for other related purposes. For example, we might use information about people who have requested a service to carry out a survey to find out if they are happy with the level of service they received.

We will collect professional information (e.g. business related data) about the contact and their company either submitted to our website, passed on during telephone conversations, included in emails and mobile messaging and any other form of written or verbal communication. For example, we might keep a record of your name, work address and associated delivery addresses, work email address and work telephone number/s.

The contract between us (including terms and conditions), support ticket or statement of work will explain the services to be provided or work to be carried out, and detail any specific instructions regarding data handling.

We do not normally provide subscription-based services, or collect data to provide marketing information; if we want to do this, we will always explain what we need your data for, obtain your permission to use your data in this way, and give you the opportunity to cancel your subscription/information service at any time.

Support

When you call our Support department we collect information from you about your computer or the equipment/system you are using and the issue you are reporting. We will store that information in ConnectWise, our support ticket system. We also store your company information in ConnectWise. We use this information to provide you with support services. All data in transit to/from, and stored in, ConnectWise, is encrypted.

All 4s Systems staff have access to ConnectWise to enable them to carry out their duties. Access to ConnectWise is password protected; access to various areas within ConnectWise is controlled by the Operations Director.

To provide support, our technicians may need to log into your computer or server, and/or to view and/or share your computer screen. To do this we will use either GoToAssist or Panda System Management. These services may require you to download and install an 'agent' on your machine that will allow us to connect, or if your contract with us provides for support this we will have installed the software on your machine that allows us access.

Before connecting we will confirm that it is OK and convenient to do so, unless we are providing unattended support in accordance with our contract; we strongly recommend that you save and close any documents you are working on and applications you are using, especially where these are confidential and/or contain personal data, unless they are the subject of the support call.

To provide the service to you we may ask you to send certain data to us, or we may need to copy data from your computer to a temporary storage drive or network folder. This data may contain personal information. We will only store your data, or access it, for the express purpose of fulfilling the service that you have requested of us. When the job is completed, any data sent to us or temporarily stored will be erased either immediately, or after the agreed period of time.

All of our staff have signed a Confidentiality Policy, and the contract between us explains what we are allowed and not allowed to do.

Email

Email that you send to us, including attachments, will be used for the purposes it was sent, and may also be monitored and used by us for reasons of security and for ensuring compliance with company policy. Email monitoring or blocking software may be used.

Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

Sent and received emails will not routinely be deleted, unless you specifically request us to do so.

Complaints

In the very unlikely event that we receive a complaint we will create a ticket in ConnectWise containing the details of the complaint. This ticket will contain the identity of your company and the complainant, the nature of the issue and any 4s Systems staff members involved.

We will only use the personal information internally to process and investigate the complaint and to check on the level of service we provide.

We will need to disclose the complainant's identity internally to whoever is involved in the complaint. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Your rights

Under the Data Protection Act (DPA) and General Data Protection Regulation (GDPR), you have rights as an individual which you can exercise in relation to the information we hold about you, namely;

- The right to be informed; why we process the personal data, who we share the data with and how long we will store the data for (see above)
- The right of access to your data
- The right to rectification of errors in the data we hold about you
- The right to erasure of the data - please note that for employment purposes we *have* to hold certain personal data
- The right to restrict processing
- The right to data portability
- The right to object
- The right not to be subject to an automated decision

You can read more about these rights at

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

Access to personal information and the excising of rights

We will be as open as we can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'Subject Access Request'. If we do hold information about you we will:

- give you confirmation as to whether or not we are holding any personal information about you and if we are, a description of it
- tell you why we are holding the information and how long we will hold it for
- tell you your rights in respect of personal data held by us
- tell you who it could be disclosed to
- let you have a copy of the information in an intelligible form

Please note however that your right to obtain a copy of your information must not adversely affect the rights and freedoms of others.

To make an enquiry about any personal information we may hold, you need to put the request in writing to our Managing Director, at the address below.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

If we do hold information about you, you can ask us at any time to correct any mistakes or exercise any of your other rights by, once again, contacting the Managing Director.

Disclosure of personal information

Generally we will not disclose personal data to third parties not listed in this Policy without your consent. However there may be circumstances where we can pass on personal data without consent for example, to prevent and detect crime and to produce anonymised statistics.

Personal information retention

We will retain personal information as described in this policy. In normal circumstances, information will be retained as follows, excepted where law requires us to keep records for a longer period...

- Information in sent and received emails - indefinitely unless you request emails to be deleted
- Contractual information (that may contain personal data) - duration of contract plus 3 years
- Information within financial records - 6 years from end of the last company financial year to which they relate
- Employment/HR information - during employment plus 5 years after leaving the company. Unsuccessful applicant information is not retained, except the email advising that you have been unsuccessful which will be retained as above
- Cookies - as described above
- Compliant information - as described above

Complaints or queries about data protection

We try to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This Privacy Policy was drafted with clarity in mind. It does not provide exhaustive detail of all aspects of our collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

If you want to make a formal complaint about the way we have processed your personal information, you can contact the ICO (the statutory body that oversees data protection law in the UK) at...

<https://ico.org.uk/global/contact-us/>

Links to other websites

This Privacy Policy does not cover the websites accessed via the links provided above. We encourage you to read the privacy statements on the other websites you visit.

Changes to this privacy Policy

We keep our Privacy Policy under regular review. Please ensure you look at it regularly to be aware of any updates.

How to contact us

You can write to us at:

John Crane, Managing Director
4s Systems Limited
Shepperton Studios
Studios Road
TW17 0QD

Alternatively, you can call us on +44 1932 572345