

PRIVACY NOTICE

Document Control

Reference: GDPR REC 4.1

Issue No: 1

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1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

2. Responsibilities

- 2.1 The Compliance Manager / GDPR Owner is responsible for ensuring that this notice is made available to data subjects prior to Trick Stuff Ltd t/a Green Light Technology Solutions collecting/processing their personal data.
- 2.2 All Employees/Staff of Trick Stuff Ltd t/a Green Light Technology Solutions 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?

Trick Stuff Ltd t/a Green Light Technology Solutions are a managed services provider. We provide managed IT services, telephony and software development services and products. We utilise a number of tools which monitor and record information for diagnostic purposes.

Our Compliance Manager / GDPR Owner and data protection representatives can be contacted directly here:

- compliance@glts.co.uk
- 08444 820 531

The personal data we would like to collect and process on you is:

Personal data type:	Source (where Trick Stuff Ltd t/a Green Light Technology Solutions obtained the personal data from if it has not been collected directly from you, the data subject. Note if the personal data has been accessed from publicly accessible sources):
Name	Your Employer / Remote Monitoring Software
Place of Employment	Your Employer
Job Title	Your Employer
Contact Telephone Numbers	Your Employer
IP Address	Remote Monitoring Software

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

- Provision of services as per your organization's contracted services
- Provision of a quotation for services
- Provision of services through third parties with which you have subscription services (i.e. email providers, DNS providers etc.)

Our legal basis for processing for the personal data:

- A contract is in place with your organisation to provide the details required
- You have requested a quotation or contacted us regarding the provision of services

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

- To communicate with you regarding the Services, including to provide you important notices regarding changes to our Terms and to address and respond to your requests, inquiries, and complaints.
- To send you surveys in connection with our Services.
- To assist in the investigation of suspected illegal or wrongful activity, and to protect and defend our rights and property, or the rights or safety of third parties.
- To develop, provide, and improve our Services.
- To enforce our Terms of Use or this Privacy Notice, or agreements with third parties.

The special categories of personal data concerned are:

- None

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 Trick Stuff Ltd t/a Green Light Technology Solutions 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 contacting our compliance team via email or post. Trick Stuff Ltd t/a Green Light Technology Solutions maintains an internal procedure for the withdrawal of consent by both Data Subjects and their children (where applicable). The forms required can be requested from the Compliance Team.

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3.3 Disclosure

Trick Stuff Ltd t/a Green Light Technology Solutions will pass on your personal data to third parties without first obtaining your consent. The following third parties will receive your personal data for the following purpose(s) as part of the processing activities:

Third country (non-EU)/international organisation	Safeguards in place to protect your personal data	Retrieve a copy of the safeguards in place here:
ConnectWise, Inc United States	Standard Contractual Clauses	https://www.connectwise.co.uk/legal
Warranty Master Canada	As per link	https://warrantymaster.com/blog/gdpr-compliance
The Rocket Science Group LLC d/b/a MailChimp United States	Member of the EU – US Privacy Shield	https://kb.mailchimp.com/accounts/management/about-the-general-data-protection-regulation

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Trick Stuff Ltd t/a Green Light Technology Solutions will pass on your personal data to third parties with which you have subscription services. The following third parties will receive your personal data for the following purpose(s) as part of the processing activities only if you subscribe to their services and we are acting as an intermediary:

Third country (non-EU)/international organisation	Safeguards in place to protect your personal data	Retrieve a copy of the safeguards in place here:
Dreamhost United States	Dreamhost are implementing a solution to protect data in accordance with the mandate	https://www.dreamhost.com/legal/privacy-policy/
Campaign Monitor Australia	As per link	https://www.campaignmonitor.com/trust/gdpr-compliance/
Microsoft United States	Member of the EU – US Privacy Shield and all data is located in the EEA	https://www.microsoft.com/en-us/trustcenter/privacy/gdpr
Barracuda Inc, United States	Member of the EU – US Privacy Shield and all data is located in the EEA	https://www.barracuda.com/company/legal/gdpr
Webroot United States	Standard Contractual Clauses	Webroot Privacy Statement
Duo Inc United States	Standard Contractual Clauses	https://duo.com/assets/pdf/gdpr-data-protection-addendum.pdf

3.4 Retention period

Trick Stuff Ltd t/a Green Light Technology Solutions will retain your Personal Data for as long as you maintain an account or as otherwise necessary to provide you the Services. We will also retain your Personal Data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Where we no longer need to process your Personal Data for the purposes set out in this Privacy Notice, we will delete your Personal Data from our systems.

Where permissible, we will also delete your Personal Data upon your request, as further described in section 3.5 of this Privacy Notice.

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 Trick Stuff Ltd t/a Green Light Technology Solutions 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.

3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Trick Stuff Ltd t/a Green Light Technology Solutions (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 Trick Stuff Ltd t/a Green Light Technology Solutions' data protection representatives Compliance Manager / GDPR Owner.

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The details for each of these contacts are:

	Supervisory authority contact details	Compliance Manager contact details
Contact Name:	Information Commissioner's Office	David Perrott
Address line 1:	2nd floor	Green Light Technology Solutions
Address line 2:	Churchill House	Unit 3, Llys Caer Felin,
Address line 3:	Churchill way	Felinfach,
Address line 4:	Cardiff	Swansea,
Address line 5:	CF10 2HH	SA5 4HH
Email:	wales@ico.org.uk	compliance@glts.co.uk
Telephone:	029 2067 8400	08444 820531

3.7 **Privacy statement**

Read more about how and why we use your data here <http://www.glts.co.uk/t/legal>.

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".

How we use your information

This privacy notice tells you how we, Trick Stuff Ltd t/a Green Light Technology Solutions, will collect and use your personal data for cookies, tracking and analytical purposes

Why does Trick Stuff Ltd t/a Green Light Technology Solutions need to collect and store personal data?

In order for us to provide you with services or products 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.

In terms of being contacted for marketing purposes Trick Stuff Ltd t/a Green Light Technology Solutions would contact you for additional consent.

Will Trick Stuff Ltd t/a Green Light Technology Solutions share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Trick Stuff Ltd t/a Green Light Technology Solutions or you 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 Trick Stuff Ltd t/a Green Light Technology Solutions' 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 however we do not anticipate that any sensitive information will be collected.

How will Trick Stuff Ltd t/a Green Light Technology Solutions use the personal data it collects about me?

Trick Stuff Ltd t/a Green Light Technology Solutions 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. Trick Stuff Ltd t/a Green Light Technology Solutions 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 Trick Stuff Ltd t/a Green Light Technology Solutions 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?

Trick Stuff Ltd t/a Green Light Technology Solutions at your request, can confirm what information we hold about you and how it is processed. If Trick Stuff Ltd t/a Green

Light Technology Solutions 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 Trick Stuff Ltd t/a Green Light Technology Solutions 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?

Trick Stuff Ltd t/a Green Light Technology Solutions accepts the following forms of ID when information on your personal data is requested:

Passport, driving licence, birth certificate, utility bill (from last 3 months).

Contact details of the Compliance Manager / GDPR Owner:

	Compliance Manager / GDPR Owner contact details
Contact Name:	David Perrott
Address line 1:	Green Light Technology Solutions
Address line 2:	Unit 3, Llys Caer Felin,

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Address line 3:	Felinfach
Address line 4:	Swansea
Address line 5:	United Kingdom
Email:	compliance@glts.co.uk
Telephone:	08444 820 531

Document Owner and Approval

The Compliance Manager / GDPR Owner is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff on the corporate SharePoint site and is published "Privacy Notice".

Signature:

Date:

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	David Perrott	23/05/18