

## Privacy Notice

This notice sets out how we will use the information you supply to us. The data controller in respect of personal information collected is Econocom Ltd (our details are noted below). References to “we” and “us” and “data controller” mean Econocom Ltd. This notice will inform you as to how we process your personal data on our website and when you engage in our services. This privacy notice also tells you about your privacy rights pursuant to the Data Protection Act 2018, UK GDPR and EU GDPR (“Data Protection Laws”).

## Controller for personal data

A “controller” is a person or organisation who alone or jointly determines the purposes for which and the way any personal data is or is likely to be processed. Unless we notify you otherwise we are the controller of your personal data.

## Scope

This notice applies to the processing of personal data by us in connection with any:

- Organisations or persons for the provision of services by us.
- Suppliers who provide us with products and services to us.
- Visitors on our website.

## Types of personal data

Personal data or personal information means any information about an individual from which that person can be identified. It does not include data where the identity has been removed. This is known as anonymised data. Anonymised data falls outside the scope of Data Protection Laws.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together:

- **Identity Data** includes first name, last name, username or similar identifier and title.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details for the provision of services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Profile Data** includes your username and password, searches made by you, your ratings and comments, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

## How we collect your personal data

Directly from you: You give us your personal data in your direct interactions with us. Such personal data includes Identity Data, Contact Data, Financial Data, Profile Data, Usage Data, Technical Data, Marketing and Communications Data (i) by filling in forms on our website (ii) by leaving ratings and comments (iii) by corresponding with us by email or post (iv) by calling us over the telephone.

This includes personal data you provide when you:

- subscribe to our service or publications.
- request marketing to be sent to you.
- give us feedback or contact us if you have any concerns.
- participate in our marketing or other promotional events.

## Directly from use of our website

We gather information and statistics collectively about visitors to our website. Analysis of this information demonstrates the most frequently used sections of the website and assists us in continually improving the online service. You give us your personal data, which includes Profile Data, Usage Data, Technical Data and/or Marketing and Communications Data when you use our website or which we have agreed with you to use or when you review any publications or marketing material, we send you. Please see our cookies notice for more information.

Indirectly: Third-party sources: We receive Identity Data and Contact Data, about you from third parties when:

- we provide our services or other parties send us your personal data to enable the provision of those service.
- you provide your personal data to a third party for the purpose of sharing it with us.
- we interact with governmental or regulatory bodies or other authorities in relation to you or on your behalf.

## **Providing personal data**

Where we need to collect personal data by law or under the terms of a contract we have with you and you do not provide that information when requested we may not be able to perform the contract we have or are trying to enter into with you for example to provide you with our services. In this case we may have to cancel our service but we will notify you if this is the case at the time.

## **Legal basis and purposes of processing**

### **How we use your personal data**

We will only use your personal data when the law allows us to. We will use your personal data in the following circumstances:

- Performance of a contract: Where we need to perform the contract we are about to enter into or have entered into with you. For example when you sign up to our services.
- Legal obligation: Where we need to comply with a legal obligation. For example for accounting or legal purposes.
- Legitimate interests: Where it is necessary for our legitimate interests or those of a third party and your interests and fundamental rights do not override those interests.
- Consent: We do not generally rely on consent as a legal basis for processing your personal data. Where we do rely on consent you have the right to withdraw consent at any time. Please contact us at [contracts@econocom.om](mailto:contracts@econocom.om) to withdraw consent. Please also see [Marketing communications](#).

## Purposes for which we will use your personal data

We have set out below in a table format a description of all the ways we plan to use your personal data and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
For the provision of our services to you.	(a) Identity (b) Contact	Performance of a contract with you
To respond to any enquires	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests
To process and deliver our services to you including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests i.e., to recover debts due to us
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy notice (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests i.e., to keep our records updated and to study how customers use our products/services
To administer and protect our business and this website including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests i.e., to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy  <b>Note:</b> Where applicable consent will be used for data analytics obtained through

		cookies or similar technologies. See our cookies notice
To make suggestions and recommendations to you about our services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests to develop our products/services and grow our business

**Know your Client and Anti-Money Laundering Regulations**

Where you are a customer, we will need to carry out anti-money laundering checks before you can proceed with our services to you. This will include processing your Identity Data and supplementary documents that you will need to provide to us. We will let you know the types of documents we require from you where it is necessary to carry out our checks. Typically we will request for your passport details, proof of address and information regarding source of funds. Our lawful basis for processing personal data in this context is pursuant to our legal obligations under anti-monitoring regulations.

**Marketing communications**

We may send you marketing communication. You have the right to object to processing of your personal data for direct marketing purposes. You can unsubscribe from receiving marketing communications from us by using the unsubscribe methods contained in communications we send to you or by contacting us. See [Contact us](#).

Where you opt out of receiving marketing communications this will not apply to personal data provided to us as a result of registering for or using our service, your service experience or other interactions with this website.

**Sharing personal information**

We may have to share your personal data with the parties set out below:

Your personal information will be used by our employees and contractors who are working on providing your services to you on a need-to-know basis.

Personal information may be shared with professional advisers such as our lawyers and auditors and other third parties, such as service providers, that help with our operation, management and administration.

Where you are a customer we may undertake a credit check against you and will supply your personal information to credit reference agencies (**CRAs**) which will give us information about you, such as about your financial history. We do this to confirm your identity and to identify any criteria that may be related to an increased risk.

We may also continue to exchange information about you with CRAs on an ongoing basis, including information about the contracts you are party to or any defaults / failures to keep to their terms. CRAs will share your information with other organisations. Your data will also be linked to the data of your spouse, any joint applicants for financial products or other financial associates.

The CRAs we use is Experian. CRAs act as separate data controllers when using the information we pass to them. The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail at <http://www.experian.co.uk/crain/index.html>.

Information relevant to credit searches may be shared with other organisations to help make decisions about credit and credit related services such as insurance, trace debtors, recover debt, prevent money laundering and fraud and to manage accounts. This may include:

- organisations who introduced us to the party you are connected with;
- organisations who act on behalf of the party you are connected with;
- organisations who act on our behalf;
- anyone who has a legal right to such information; or
- anyone to whom we may intend transferring our rights under any contract we may have with the party you are connected with.

We may share personal information with our suppliers. This would include service providers who support our business including IT and communication suppliers and outsourced business support to ensure our service runs smoothly.

We may share your personal information with Advertising networks and analytics service providers: This is to support and display ads on our website and other social media tools.

We may share your personal information with third parties in the context of the acquisition or transfer of any part of our business or in connection with the business reorganisation. If a change happens to our business then the new owners may use your personal data in the same way as set out in this privacy notice.

## **International transfers**

We may transfer and process your personal data outside of the United Kingdom/European Union to countries where data protection laws are less stringent than those in the UK. When we transfer your personal data outside of the UK, we only do so to entities that offer our users the same level of data protection as that afforded by the UK Data Protection Act 2018, UK GDPR and the EU GDPR.

1. We will only transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal information; or
2. We will use specific contracts approved for use in the UK or EU which give personal information the same protection it has in the UK/EU. For example, the use of Article 46 UK and EU GDPR safeguard mechanisms to transfer personal data endorsed by the UK Government or European Commission.

To find out more about the transfer mechanism used please contact us at [contracts@econocom.com](mailto:contracts@econocom.com).

## **How long will information be kept?**

Information will be kept for as long as required to ensure compliance applicable laws and regulations. We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal information we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means and the applicable legal, regulatory, tax, accounting or other requirements.

## Data Subject Rights

Under certain circumstances, you have rights under Data Protection Laws. You can:

**Request access to your personal data:** This is known as a "data subject access request" and enables you to receive a copy of the personal data we hold about you.

**Request correction of your personal data:** This enables you to have any incomplete or inaccurate information we hold about you corrected.

**Request erasure of your personal data:** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Note: We may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you at the time of your request.

**Object to processing of your personal data:** This is where we are processing your personal data based on a legitimate interest or those of a third party and you may challenge this. However, we may be entitled to continue processing your information based on our legitimate interests or where this is relevant to any legal claims. See also [Marketing communications](#).

**Request restriction of processing your personal information:** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the information's accuracy (b) where our use of the information is unlawful but you do not want us to erase it (c) where you need us to hold the information even if we no longer require it as you need it to establish, exercise or defend legal claims or (d) you have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to use it.

**Request transfer of your personal information ("data portability"):** This is where in some circumstances we will provide to you or a third party you have chosen your personal data in a structured, commonly used, machine-readable format.

**Right to withdraw consent:** This is where we are relying on consent to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. Depending on the processing activity, if you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

**Automated decision making:** This is where decisions are made about you by automated means. We do not carry out automated decision making which results in legal or similarly significant effect.

If you would like to exercise these rights please contact [contracts@econocom.com](mailto:contracts@econocom.com).

You will not have to pay a fee to access your personal data or to exercise any of the other rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information or to exercise any of your other rights. This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you

## Concerns and complaints

We would appreciate the chance to deal with your concerns in the first instance. Please see [Contact us](#) section. If you have unresolved concerns and you live or work in the UK or believe that a personal data breach happened in the UK you have the right to complain at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

If you live or work outside the UK or you have a complaint concerning our personal data processing activities you may lodge a complaint with another supervisory authority.

## Changes to our privacy notice

This privacy notice may be changed from time to time in response to legal, technical or business developments. We will take appropriate measures to inform you when we update our privacy notice. We will obtain your consent to any material privacy notice changes if and where this is required by applicable Data Protection Laws.

## Contact us

If you would like more information about the way we manage personal information that we hold about you please contact us at:

- By email: [contracts@econocom.com](mailto:contracts@econocom.com)
- By post: Chris Bradley-James at Econocom Ltd, 33 Queen Street, London, EC4R 1BR
- By phone: +44 (0)208 940 2199.

## Version control

This version was last updated on 19 June 2023.