



Make IT Effective

Information Security Document: Privacy & Cookie Policy

Version 2.3

Public



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1. DOCUMENTATION INFORMATION AND CONTROL

VERSION HISTORY

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DOCUMENT OWNER

Name & Job Title
Heath Roberts

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3. INTRODUCTION

We are committed to safeguarding the privacy of our website visitors, clients and service users.

This includes:

www.AxessSystems.co.uk

<http://www2.AxessSystems.co.uk>

www.Instant-Axess.co.uk.

This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.

We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.

Our website incorporates privacy controls, which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications and limit the publication of your information.

You can access the privacy controls via <https://www.axesssystems.co.uk/preference-centre/>

In this policy, "we", "us" and "our" refer to Axess Systems Limited. For more information about us, see Section 19.

4. HOW WE USE YOUR PERSONAL DATA

In this Section 2 we have set out:

- the general categories of personal data that we may process;

- in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
- the purposes for which we may process personal data; and
- the legal bases of the processing.

2.1 If you are a website visitor, we may process data about your use of our website ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use.

The source of the usage data is our analytics tracking systems, which includes Google Analytics, Salesforce Pardot and A1 Webstats.

This usage data may be processed for the purposes of analysing the use of the website.

The legal basis for this processing is legitimate interests, namely monitoring and improving our website and identifying relevant interest for direct marketing and communications.

2.2 If you are a customer of Axess Systems, we may process information relating to our customer relationships, including customer contact information "**customer relationship data**". The customer relationship data may include your name, your employer, your job title, your contact details, and information contained in communications between us and you and/or employer.

The source of the customer relationship data is you and/or your employer. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications and promoting our products and services to customers. The legal basis for this processing is legitimate interests, namely the proper management of our customer relationships.

2.3 If you are a prospect of Axess Systems, we may process information contained in any enquiry you submit to us regarding goods and/or services

("enquiry data"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you. The legal basis for this processing is legitimate interest. As it is a reasonable expectation that IT professionals and IT decision makers receive information and communication from IT supplier.

2.4 If you procure from our webstore (www.instant-axess.co.uk), we may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website "**transaction data**". The transaction data may include your contact details, your card details and the transaction details. The transaction data is not retained by Axess Systems and PCI DSS Compliant. It may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract. For avoidance of doubt transactions will only be accepted by businesses. No contract will be entered into with private individuals.

2.5 In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

5. AUTOMATED DECISION-MAKING

We currently do not have systems in place to make automated decision-making in relation to your personal data.

But, we reserve the right to use your personal data for the purposes of automated decision-making in relation to direct marketing.

6. PROVIDING YOUR PERSONAL DATA TO OTHERS

We will only disclose your enquiry data, transaction data, or customer relationship data to selected third party suppliers of goods and services

identified on our website, where it forms part of delivering the service to you.

For example if you enquire about a vendor/solution which requires vendor support, then your details will be used to enable them to contact you so that they can offer, market and sell to you relevant goods and/or services for which you have enquired. Each third party will act as a data controller in relation to the enquiry data that we supply to it; and upon contacting you, each such third party may supply to you a copy of its own privacy policy, which will govern that third party's use of your personal data.

Our payment services providers, SagePay, may handle financial transactions relating to our website and services. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at <https://www.sagepay.co.uk/policies/privacy-policy>.

7. INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA

In this Section 5, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).

It is very unlikely your Personal Data will be transferred outside of the EEA. If for any unforeseen circumstances this becomes necessary, we will take all reasonable steps necessary to ensure Personal Data transferred outside the EEA will be treated securely and in accordance with this Privacy Policy, and that of the GDPR.

8. RETAINING AND DELETING PERSONAL DATA

This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

We will retain your personal data inline with our Records Retention Policy, when we collect or process your personal data, we'll only keep it for as long as is necessary.

9. SECURITY OF PERSONAL DATA

We will take appropriate technical and organisational precautions to secure your personal data and to prevent the loss, misuse or alteration of your personal data.

This is backed by our ISMS which is certified to ISO27001:2013

10. AMENDMENTS

We may update this policy from time to time by publishing a new version on our website.

You should check this page occasionally to ensure you are happy with any changes to this policy.

This document forms part of the Axess Systems Ltd.'s ISMS Policy and as such, must be fully complied with.



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