

JXG MANAGEMENT SOLUTIONS LIMITED PRIVACY NOTICE

1. INTRODUCTION

This Privacy Notice provides you with details of how we collect and process your personal data through the use of our website www.jxgmanagementsolutions.co.uk and/or when you become a client or supplier to us.

By providing us with your data, you warrant to us you are over 13 years of age.

JXG MANAGEMENT SOLUTIONS LIMITED is the data controller, and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

We have appointed a Privacy Manager who is in charge of privacy related matters, if you have any questions about this privacy notice, please contact the Privacy Manager using the details set out below.

Contact details

Our full details are: -

Full name of legal entity: **JXG MANAGEMENT SOLUTIONS LIMITED**

Registered in England and Wales no: **11164791**

Registered Office: **C/o Loch Associates, Oxford House, 15 – 17 Mount Ephraim Road, Tunbridge Wells, Kent TN1 1EN**

Name of our Privacy Manager: **Julianne Green**

Email address: julianne@jxgmanagementsolutions.co.uk

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at:

julianne@jxgmanagementsolutions.co.uk

2. WHAT DATA DO WE COLLECT ABOUT YOU, FOR WHAT PURPOSE AND ON WHAT GROUNDS WE PROCESS IT.

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process the following categories of personal data about you:

- **Communication Data** that includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishments, pursuance or defense of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.
- **Customer Data** that includes data relating to any purchases of services such as your name, title, billing address, delivery address, email address, phone number and contact details. We

process this data to supply services you have purchased and to keep records of such transactions. Our lawful ground 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.

- **User Data** that includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back – ups of our website and/or databases and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.
- **Technical Data** that includes data about your use of our website and online services such as your IP address, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.
- **Marketing Data** that includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in our promotions such as competitions, prize draws and free give-aways, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising. Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our services, to develop them, to grow our business and to decide our marketing strategy.
- We may use Customer Data, User data, technical data and Marketing Data to deliver relevant website content and advertisements to you (including Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you. Our lawful ground for this processing is legitimate interests which is to grow our business. We may also use such data to send other marketing communications to you. Our lawful ground for this processing is either consent or legitimate interests (namely to grow our business).

Sensitive Data

We do not collect any Sensitive data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver services to you). If you don't provide us with the requested data, we may have to cancel a service you have ordered but if we do, we will notify you at the time.

We will only use your personal data for the purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this please email us at julianne@ixgmanagementsolutions.co.uk In case we

need to use your details in an unrelated new purpose we will let you know and explain the legal grounds for processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

We do not carry out automated decision making or any type of automated profiling.

3. HOW WE COLLECT YOUR PERSONAL DATA

We may collect data about you by you providing the data directly to us (for example by filling in forms on our website or by sending us emails). We may automatically collect certain data from you as you use our website by using cookies and similar technologies.

We may receive data from third parties such as analytics providers such as google based outside the UK, advertising networks such as Facebook based outside the UK and search information providers such as Google based outside the UK and providers of technical, payment and delivery services

We may also receive data from publicly available sources such as Companies House and the Electoral Register based inside the UK.

4. MARKETING COMMUNICATIONS

Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).

Under the Privacy and Electronic Communications Regulations (PECR), we may send you marketing communications from us if (i) you made a purchase or asked for information from us about our services or (ii) you agreed to receive marketing communications and, in each case, you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However, you can still opt out of receiving marketing emails from us at any time.

Before we share your personal data with any third party for their own marketing purposes, we will get your express consent.

You can ask us or third parties to stop sending you marketing messages at any time by emailing us at julianne@jxgmanagementsolutions.co.uk

If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions, such as services received.

5. DISCLOSURES OF YOUR PERSONAL DATA

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

- Service providers who provide IT and system administration services and remote PA assistance.
- Professional advisers including lawyers, bankers, auditors and insurers
- Government bodies that require us to report processing activities.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We are subject to the provisions of the General Data Protection Regulations (GDPR) that protects your personal data. Where we transfer your data to third parties outside of the UK, we ensure that certain safeguards are in place to ensure a similar degree of security for your personal data. As such:

- We may transfer your personal data to countries that the United Kingdom regulatory authorities have approved as providing an adequate level of protection for personal data by; or
- If we use US-based providers that are part of the UK regulator approved privacy framework, we may transfer data to them, as they have equivalent safeguards in place: or
- Where we use certain service providers who are established outside of the UK, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection as has in Europe.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

7. DATA SECURITY

We have put in place security measures to prevent your personal data from accidentally being lost, used, altered, disclosed or accessed without authorisation. We also only allow access to your personal data to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions, and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to do so.

8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collect it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When deciding what the correct time is to keep the data for, we look at its amount, nature and sensitivity, potential risk if harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being a customer.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about cookies we use, please see our cookie policy.

10. YOUR LEGAL RIGHTS

Under data protection law you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to the portability of data and (where the lawful grounds of processing is consent) to withdraw consent.

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

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. You also have the right to ask us to delete or remove

your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. 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 data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data 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 data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of these rights set out above, please email us at julianne@jxgmanagementsolutions.co.uk

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 or we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data 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 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.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([Home | ICO](#)). We should be grateful if you would contact us first if you do have a complaint so that we can try and resolve it for you.