

1. Scope

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

2. Responsibilities

- 2.1 The Information Security Manager is responsible for ensuring that this notice is made available to data subjects prior to CSP collecting/processing their personal data.
- 2.2 All Senior Management and Account Managers of CSP 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?

At Computer Software & Peripherals (CSP) we are dedicated to providing I.T. Services to help our customers grow and evolve, with solutions tailored to meet our customer's needs, providing scalable solutions that grow with the customer. We've been working successfully with small and medium sized businesses since 1998, and our extensive experience and affordable technology solutions are trusted by our customers worldwide.

Our Registered address is:-

1st Floor,
42/44 Bishopsgate
London
EC2N 4AH

Our main office and datacentre address is:-

41 Market Street
Watford
Herts
WD18 0PN

Our company is registered in England & Wales, our company no is **GB3292487**

We are registered with the ICO as a Data Controller, no. **ZA233111**

The Information Manager for CSP is [Maria Weyer](#)

Our Information Security Manager and data protection representatives can be contacted directly here:

- Privacy@csp.uk.com
- 01923 447711
- Support@CSP.uk.com
- 01923 444555

The personal data we will collect and record securely about you is:

Personal data type:	Source (where CSP 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	Collected from Customer\Staff\Suppliers
Address	Collected from Customer\Staff\Suppliers
Telephone Number	Collected from Customer\Staff\Suppliers
Mobile Telephone Number	Collected from Customer\Staff\Suppliers
Position	Collected from Customer\Staff\Suppliers
Company Name and address	Collected from Customer\Suppliers
Company Bank Details	Collected from Customer\Staff\Suppliers
Financial information (where we need to carry out financial background checks)	Collected from Customer\Staff\Suppliers

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

- if you have asked us to provide you with a quote for goods or services
- CSP collects data to operate effectively and provide you the best experiences with our products.
- We will use the data to communicate with you regarding your services
- To keep a record of our relationship with you. We log all communication into a locally installed software called Connectwise, please see their privacy policy [here](#)
All of this data is stored in our Datacenter on-site at the Watford branch of CSP.
- to allow for sending statements\collection of payments
- To provide you with other information which we feel may interest you. This may include newsletters, invitations, breaking security alert information
- We may need to share your data with third party software providers whose services you employ. We may need to provide them access to your servers\data which will not be done unless we have explicit written permission from you. We have a strict access control procedure for this purpose. Please note their privacy policy may differ from ours. If you choose to use a third party software you must check their privacy policy to ensure their compliance.

Our legal basis for processing for the personal data:

- You have provided your consent to us using your personal data for a specific purpose: You always have the right to withdraw your consent at any time
- It is necessary for compliance with a legal obligation to which we are subject: This would include where we have to retain certain records, for example, to manage health and safety, financial records, court orders etc.
- It is within our legitimate interests. Applicable law allows personal data to be collected and used if it is reasonably necessary for our legitimate interests or a third party's legitimate interests. We will rely on this ground to process your personal data when it is not practical or appropriate to ask for your consent, and where we are confident that this will not impact your rights.
- We do not knowingly collect Personal Data from individuals under 18 years without parental consent. If you become aware that an individual under 18 years of age has provided us with Personal Data without parental consent, please contact the information Security Manager

at privacy@csp.uk.com. If we become aware that an individual under 18 has provided us with Personal Data without parental consent, we will take steps to remove the data as permitted by law.

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

- You may have a customer that asks to delete their data. However their data may remain on encrypted backups we have to keep for you until the end of your data retention agreement with us. If we have to restore your data from backup, you should be aware that this may contain data that you have previously deleted.
- We will not use your personal data for activities where our interests are overridden by the impact on you, for example where use would be excessive or intrusive (unless, for instance, we are otherwise required or permitted to by law).

The special categories of personal data concerned are:

- We do not collect special categories of data for our customers.

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 Computer Software and Peripherals 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 emailing the Information Security Manager privacy@csp.uk.com a copy of GDPR DOC 2.7A - WITHDRAWAL OF CONSENT PROCEDURE and GDPR REC 4.6A - DATA SUBJECT CONSENT WITHDRAWAL FORM will be emailed by return.

3.3 Disclosure

Computer Software and Peripherals will only pass on your personal data to third parties at your request, all hosted data is stored in our onsite Datacenter in Watford. We will only transfer data to a third party after first obtaining your consent in writing. We will only transfer your data using an appropriate and secure method. If the transfer is to a country with no EU data transfer agreement we will first seek agreement from the [ICO](#).

3.4 Retention period

Computer Software and Peripherals will continue to process personal data as long as you have an active contract with us. Your data will be backed up and retained for the length of time agreed in your contract (normally 30 days). If you end your contract with us we will transfer and delete your stored customer data but we will keep your company data in line with legal obligations, for example financial records will be kept for 7 years and then deleted.

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 CSP 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. If you wish to see our Subject Access Request Procedure GDPR DOC 2.2 or require a Subject Access Request Form GDPR REC 4.2 please send an email to privacy@csp.uk.com

3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by CSP (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 CSP’s data protection representative Information Security Manager.

The details for each of these contacts are:

	Supervisory authority contact details	Information Security Manager contact details
Contact Name:	The Information Commissioner	Maria Weyer
Address line 1:	Wycliffe House	41 Market Street
Address line 2:	Water Lane	Watford
Address line 3:	Wilmslow	Herts
Address line 4:	Cheshire	WD18 0PN
Address line 5:	SK9 5AF	
Email:	https://ico.org.uk/concerns/	privacy@csp.uk.com
Telephone:	0303 123 1113	01923 444555

3.7 Privacy statement

Read more about how and why we use your data here [\[link to privacy statement on the website\]](#). (This can be sent on request until the link is active by emailing privacy@csp.uk.com)

3.8 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, Computer Software and Peripherals will collect and use your personal data for We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- Internal record keeping.
- We may use the information to improve our products and services.
- We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.
- From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail.

Why does CSP need to collect and store personal data?

In order for us to provide you with a service we need to collect personal data for correspondence purposes and to resolve any problems you may have with your service 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 Computer Software and Peripherals would contact you for additional consent.

Will Computer Software and Peripherals share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Computer Software and Peripherals 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 Computer Software and Peripherals's procedures. We currently use ConnectWise for logging all details about our customers including call logging system set ups, fault resolution recording, procurement and invoicing. We use Virtual Cabinet for a complete audited document storage, this enables us to be a paperless office. We use Sage to store accounting details of our customers. All data for these software packages is stored onsite in our datacenter and backed up to a secure site in Oxford. Only CSP has access to this data. All suppliers

of software packages are under the same non-disclosure agreements that all CSP staff members are.

If we ever wished 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.

How will CSP use the personal data it collects about me?

Computer Software and Peripherals 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. CSP 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 CSP 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?

Computer Software and Peripherals at your request, can confirm what information we hold about you and how it is processed. If Computer Software and Peripherals 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 CSP 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?

CSP 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 Information Security Manager:

	Information Security Manager contact details
Contact Name:	Maria Weyer
Address line 1:	41 Market Street
Address line 2:	Watford
Address line 3:	Herts
Address line 4:	WD18 0PN
Address line 5:	
Email:	mailto:privacy@csp.uk.com
Telephone:	01923 444555

Document Owner and Approval

The Information Security Manager 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 in Virtual Cabinet and is published.

Signature:

Date:

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Maria Weyer	21.05.18
2	Change of Registered Address	Maria Weyer	21.11.19