

Privacy & Data Statement

Introduction

Stanford & Green Ltd respects your privacy and is committed to protecting your personal data. This document, explains how we collect, use and protect your personal data. It also details the rights you have surrounding your personal data and how you can exercise those rights.

It is important that you read this privacy notice together with any other privacy notice of fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

Please also use the Glossary to understand some of the terms used in this privacy notice.

I. Who we are

Data Processor

Stanford & Green Ltd are a services provider and offer a range of solutions to our customers. We have Application Programming Interfaces (API's) and development tools to enable Third Parties to integrate into our Payment Gateway. Stanford & Green Ltd is a Data Processor and responsible for your personal data (collectively referred to as "Stanford & Green", "we", "us" or "our" in the privacy notice).

We have an appointed Data Privacy Manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Data Privacy Manager using the details set out below.

Full name and legal entity – Stanford & Green Ltd

Email address – info@stanfordandgreen.co.uk

Postal address – Knightrider Chambers, 12 Knightrider Street, Maidstone, Kent ME14 6LP

Telephone no. – 01622 683308

You have the right to make a complaint at any time to the Information Commissioners Office (ICO), the UK supervisory authority for data protection issues. www.ico.org. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please do contact us in the first instance.

2. The data we collect about you

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 (anonymous data).

The ICO website defines personal data as follows: -

Personal data means data which relates to a living individual who can be identified –

(a) from those data, or

(b) from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller, and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

It is important to note that, where the ability to identify an individual depends partly on the data held and partly on other information (not necessarily data), the data held will still be “personal data”

We have grouped together the types of personal data we hold as follows: -

Identity Data – includes first and last name, username or similar identifier, marital status, title, date of birth
Contact Data – includes billing address, delivery address, email address and telephone numbers
Financial Data – includes bank account details on your Direct Debit Mandate or Standing Order Forms which are sent to BACS and payment card details, if you make payment for services by cards
Transaction Data – includes details about payments to and from you
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 which of our services you use and your feedback
Communications Data – includes your preferences in receiving communications from us. We do not collect any **Special Categories of personal data** about you (this 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). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with the Data Controller and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to establish (for example, to provide you with services). In this case we may have to continue as the law directs without your consent, but we will notify you if this is the case at the time.

3. How is your personal data collected?

The different methods we use to collect data from or about you include: -

Through direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, telephone, email or otherwise. This includes the personal data you provide when;

- You request information
- You provide copies of documents that may be required to prove your identity such as a passport or drivers licence
- You complete Direct Debit Mandates which we send to BACs
- We create an account for you to use our Payment Gateway or any of its components
- You enter into communications with us phone, email or post
- You request information to be sent to you
- You give us some feedback
- We are contracted to enforce a liability order against you.
- Through automated technologies or interactions. As you interact with our website, we may automatically collect technical data about you.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances: -

- Where we need to honour the contract that we are about to enter into or have entered into with our client (Data Controller)
- 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
- Where we need to comply with a legal or regulatory obligation

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at info@stanfordandgreen.co.uk

If we need to use your personal data for an unrelated purpose, we will, where allowed by law, notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

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

- External Third Parties are set out in the Glossary
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in the privacy notice.

6. International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

7. Data Security

- We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality
- We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where 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 collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements
- To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements
- Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us
- In some circumstances you can ask us to delete your data
- In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you

9. Your legal rights

Under certain circumstances, you have rights in relation to your personal data including to:

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 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 a 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.

Requesting 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 services to you. We will advise you if this is the case at the time you withdraw your consent.

Your rights under the GDPR are listed in full at www.knowyourprivacyrights.org

No fee usually required

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

What we may need from you

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.

Time limit to respond

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 several requests. In this case, we will notify you and keep you updated.

10. Glossary. External third parties

- Service providers who provide IT and system administration services including payment gateway file settlement
- Regulators and other authorities based in the United Kingdom who may require reporting of processing activities in certain circumstances
- Our chosen Direct Debit and Direct Credit service provider (your bank account details are personal data)
- Your merchant bank (your bank account name is personal data)
- Third party email providers
- Debt collection agencies
- Auditors – to audit our systems and transactions for the purposes of ensuring efficiency, or regulatory or contractual compliance
- We will disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with legal or regulatory obligation or request
- Third party businesses with which we are collaborating to provide a service to you. For example, if you are applying to use our services to take payments through a third-party integration

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your

consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

