

CLEVERVINE DATA PRIVACY NOTICE



AIM

Clevertvine aims to ensure that all data collected is stored and processed in accordance with the UK GDPR and Data Protection Act 2018.

This policy applies to all data, regardless of whether it is in paper or electronic format.



LEGISLATION AND GUIDANCE

This Privacy Notice meets the requirements of GDPR, and is based on [guidance published by the Information Commissioner's Office](#)..



DEFINITIONS

Term	Definition
Personal Data	Data from which a person can be identified, including data that, when combined with other readily available information, leads to a person being identified
Special Category Data	Data such as: <ul style="list-style-type: none">• Contact details• Racial or ethnic origin• Political opinions• Religious beliefs, or beliefs of a similar nature• Where a person is a member of a trade union• Physical and mental health• Sexual orientation• Whether a person has committed, or is alleged to have committed, an offence• Criminal convictions
Processing	Obtaining, recording or holding data
Data subject	The person whose personal data is held or processed
Data Controller	A person or organisation that determines the purposes for which, and the manner in which, personal data is processed
Data Processor	A person, other than an employee of the data controller, who processes the data on behalf of the data controller



DATA PROTECTION

Principles

- processed lawfully, fairly and in a transparent manner
- collected for specified, explicit and legitimate purposes ('purpose limitation');
- adequate, relevant and limited to what is necessary
- accurate and, where necessary, kept up to date
- kept in a form which permits identification of data subjects for no longer than is necessary
- processed in a manner that ensures appropriate security of the personal data

Your rights

- **Your right of access** - You have the right to ask us for copies of your personal information
- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances
- **Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances

You are not required to pay any charge for exercising your rights. If you make a request, we have 30 days to respond to you.

Please contact us at clientservices@clevertvine.co.uk or 01244 569800 or Suite 5 The Technology Centre, Inward Way, Rossmore Business Park, Ellesmere Port CH65 3EN



if you wish to make a request.

ROLES AND RESPONSIBILITIES

The Managing Director Lisa Whitehouse has overall responsibility for ensuring that CleverVine complies with its obligations. Day-to-day responsibilities rest with Lisa Whitehouse. They will ensure that all staff are aware of their Data Protection obligations, and oversee any queries related to the storing or processing of personal data.



PRIVACY/FAIR PROCESSING

We hold Personal Data about our clients, and potential clients. The nature of our business may require our clients to share Personal and/or Special Category Data with us so that we can fulfil our contractual obligations to them (lawful basis for processing). Typically, for both our records and information provided by our clients, this will include, but is not limited to:

- First Name
- Last Name
- Position
- Email
- Contact Number

Before data is shared by our clients, we may need to carry out a Data Protection Impact Assessment, which will be completed before any data is shared. If we are acting as a Data Processor, this will be subject to a Data Controller/Data Processor Agreement.

We may share data with third parties to support the operational needs and smooth running of our company. These third parties may include, but will not be limited to, facilities providers, consultants engaged by Clevertvine and specialist software providers. We will not share information with anyone without consent unless the law and our policies allow us to do so. We will ensure that only the data needed to carry out the service required is shared (data minimisation) and the data shared will, if required, be subject to Data Protection Impact Assessments and Data Controller/Data Processor Agreements..

We will only retain the data we collect for as long as is necessary to satisfy the purpose for which it has been collected.



DATA STORAGE AND SECURITY

Paper based records, digital records and portable electronic devices, such as laptops and hard drives that contain Personal and/or Special Category Data, are compliant with GDPR and are regularly assessed. Unless otherwise requested, the data provided by our clients will be returned to our client compliantly, or destroyed compliantly, within 30 days of the end of the contract.



HOW TO MAKE A COMPLAINT

If you feel that we have mishandled your or your Personal Data at any time you can make a complaint to Lisa Whitehouse by emailing clientservices@clevertvine.co.uk by or phoning 01244 569800.

Alternatively, you can contact the Information Commissioners Office by visiting their website (<https://ico.org.uk/make-a-complaint/>) or by calling their helpline on 0303 123 1113.

CleverVine

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