

Data Protection Statement (Privacy Notice)

We're updating our Data Protection Statement to take account of the new General Data Protection Regulation (GDPR) which takes effect in the UK from 25 May 2018.

This Data Protection Statement will give you some important information on how we will process your personal information. It applies from when you receive this information (though some of the rights mentioned in it are only relevant on and after 25 May 2018)

Introduction

Your personal data is data which by itself or with other data available to us can be used to identify you. We are Carn Software Ltd, the data controller. This data protection statement sets out how we will use your personal data. You can contact our Data Protection Officer (DPO) at Carn House, 31 Academy Street, Coatbridge, ML5 3AW if you have any queries.

The types of personal data we collect and use

The personal data we use may include:

- Full name and personal details including contact information (address, email address, telephone number, NI number)
- Financial details (bank account and sort code numbers)

Providing your personal data

We will tell you if providing some of your personal data is optional, including if we ask for your consent to process it. In all other cases you must provide your personal data so we can process it.

Monitoring of communications

Subject to applicable laws, we will monitor your emails and any correspondence in relation to your dealings with us.

Using your personal data: the legal basis and purposes

We will process your personal data:

1. As necessary to **perform our contract with you**
 - a. To provide support to you
 - b. To solve problems you encounter
 - c. To provide ongoing updates to your software
2. As necessary **for our own legitimate interests**
 - a. For good governance, accounting, managing and auditing our business operations
 - b. To send you marketing communications
3. Based on **your consent**
 - a. To send you marketing communications where we have asked for your consent to do so

You are free at any time to change your mind and withdraw your consent. The consequence might be that we cannot do certain things for you.

Sharing of your personal data

Subject to applicable data protection laws we may share your personal data with:

- Our legal and professional advisors, including our auditors;
- Anyone else where we have your consent or as required by law;
- To protect the security or integrity of our business operations;
- Our employees.

International Transfers

We will not transfer your data outside the UK or the European Economic Area.

Criteria used to determine retention periods

The following criteria are used to determine retention period for your personal data:

- **Retention in case of problem solving.** We will retain your personal data as long as necessary to deal with your problem. Once the problem has been solved, we will delete your data within 3 weeks.
- **Retention in case of legal requirements.** We will retain your personal data after your account has been closed or has otherwise come to an end based on our legal requirements.

Data Anonymisation

When we process your personal data to solve your problems, we will anonymise the data in such a way to make it impossible to identify you. This anonymisation will cover your name, address, contact details (including but not limited to telephone numbers, email addresses) and bank details.

Your rights under applicable data protection law

Your rights are as follows (noting that these rights don't apply in all circumstances and that data portability is only relevant from May 2018):

- The **right to be informed** about our processing of your personal data;
- The right to have your personal data **corrected if it's inaccurate** and to have **incomplete personal data completed**;
- The right **to object** to processing of your personal data;
- The right **to restrict processing** of your personal data;
- The right **to have your personal data erased** (the "right to be forgotten");
- The right to **move, copy or transfer your personal data** ("data portability"); and
- The right **to request access** to your personal data and information about how we process it.

You have the right to complain to the Information Commissioner's Office. It has enforcement powers and can investigate compliance with data protection law: ico.co.uk

For more details on the above you can contact our Data Protection Officer (DPO).