



YouCall-it.com Limited
Data Protection Policy
24th April 2018

BACKGROUND:

Youcall-it.com understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, www.youcall-it.com ("Our Digital Services") or who makes use of any of our other Digital Services and tools. We will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Digital Services. You will be required to read and accept this Privacy Policy when signing up for an Account. If you do not accept and agree with this Privacy Policy, you must stop using Our Digital Services immediately.

1. **Definitions and Interpretation**

In this Policy, the following terms shall have the following meanings:

"Account"	means an account required to access and/or use certain areas and features of Our Digital Services;
"Cookie"	means a small text file placed on your computer or device by Our Digital Services when you visit certain parts of Our Digital Services and/or when you use certain features of Our Digital Services. Details of the Cookies used by Our Digital Services are set out in section 13, below;
"Cookie Law"	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
"personal data"	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Digital Services. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR")

“We/Us/Our”	means Youcall-it.com Ltd, a limited company registered in England under company number 7226676, whose registered address is 65 Tontine Street, Folkestone, Kent, UK CT20 1JR, and whose main trading address is
“Our Sites”	The YouCall-it.com website (https://www.youcall-it.com), the YouCall-it.com web services portal (https://xsi.youcall-it.com) and any other web based serviced published on the YouCall-it.com domain.
“Digital Services”	Our sites and, in addition, any YouCall-it.com applications (mobile or otherwise) which connect to the YouCall-it.com platform.

2. Information About Us

- 2.1 Our Digital Services are owned and operated by Youcall-it.com Ltd, a limited company registered in England under company number 7226676, whose registered address is 65 Tontine Street Folkestone Kent UK CT20 1JR
- 2.2 Our VAT number is GB 990 0906 11.
- 2.3 Our Data Protection Officer is Robert Martin, and can be contacted by email at info@youcall-it.com , by telephone on 0044 845 582 2423.

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Digital Services. Our Sites may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

4. Your Rights

- 4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:
 - 4.1.1 The right to be informed about Our collection and use of personal data;
 - 4.1.2 The right of access to the personal data We hold about you (see section 12);
 - 4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 14);
 - 4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 14);
 - 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
 - 4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);

- 4.1.7 The right to object to Us using your personal data for particular purposes; and
- 4.1.8 Rights with respect to automated decision making and profiling.
- 4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.
- 4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

5. **What Data Do We Collect?**

Depending upon your use of Our Digital Services, We may collect some or all of the following personal and non-personal data (please also see section 13 on Our use of Cookies and similar technologies).

- 5.1 Name;
- 5.2 gender;
- 5.3 business/company name
- 5.4 job title;
- 5.5 profession;
- 5.6 contact information such as email addresses and telephone numbers;
- 5.7 demographic information such as post code, preferences, and interests;
- 5.8 IP address
- 5.9 web browser type and version
- 5.10 operating system;
- 5.11 a list of URLs starting with a referring site, your activity on Our Digital Services, and the site you exit to;

6. **How Do We Use Your Data?**

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under GDPR at all times. For more details on security see section 7, below.
- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:
 - 6.2.1 Providing and managing your Account;
 - 6.2.2 Providing and managing your access to Our Digital Services;
 - 6.2.3 Personalising and tailoring your experience on Our Sites;
 - 6.2.4 Supplying Our services to you (please note that We require your personal data in order to enter into a contract with you);

- 6.2.5 Personalising and tailoring Our products and services for you;
 - 6.2.6 Replying to emails from you;
 - 6.2.7 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by replying to the sent emails);
 - 6.2.8 Market research;
- 6.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email, telephone, text message, post with information, news and offers on Our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- 6.4 Third parties whose content appears on Our Sites may use third party Cookies, as detailed below in section 13. Please refer to section 13 for more information on controlling Cookies. Please note that We do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.
- 6.5 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- 6.6 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. The retention of user data is dependent on whether the user has been associated with any 3rd party “business activity” conducted via our Digital Services. A business activity would be any invitation to tender or quotation routed to or from clients or service partners, any work carried out by or for an individual or any other instance where some aspects of a user’s information is required to maintain proper records (contractual or otherwise).

Data will therefore be retained for the following periods (or its retention will be determined on the following bases):

- 6.6.1 For accounts where no business activity is involved we will remove your details 12 months after the last login or activity on your account or system, or should you close your account with Youcall-it.com the period of retention shall be no longer than 6 months from the closure date.
- 6.6.2 Where business activity is associated with the account we will retain sufficient information to allow us to retain proper records of that activity for at least five years from the date of the activity or longer if required by contract or other legislation. Notwithstanding this, if the associated account becomes inactive or is closed, information will not be used outside of the scope of related business activities after the timeframe set out in 6.6.1

7. How and Where Do We Store Your Data?

- 7.1 We only keep your personal data for as long as We need to in accordance with the policy detailed in section 6.
- 7.2 No personal data is held outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and

Liechtenstein).

7.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Digital Services. Steps We take to secure and protect your data include:

7.3.1 Limiting the scope of data held online.

- a) Personal data held directly within the YCI platform currently comprises of a Name (Forename, Surname) and an email address. The email address is expected to be a business email address, associated with the business or organisation to which the user belongs, and which governs his/her use of the portal.
- b) Optionally we may also hold a telephone number (both fixed and mobile), a fax number (rarely now), gender (male/female), a photo, a language preference and an engineer identity number (linked to individual activities to which the engineer has been assigned).
- c) From time to time we may record the network connection details of the most recent system access attempt.
- d) No sensitive personal data is held.
- e) Personal data held directly within the YCI platform is limited to basic identification details of the type normally available in the public domain for any individual.

7.3.2 Preventing all online access to digital assets of expired accounts or accounts or those for which the user has expressed a wish to be removed.

7.3.3 Controlling access to backups and disaster recovery to ensure no breach of legacy data

7.3.4 Applying rigorous security checking including ensuring that all access to digital services is authenticated and authorised by industry standard protocols and procedures.

- a) All access to the YCI portal requires a username and password which permits the logged-on user access to their organisation's home area. An administrator of that organisation may have permitted the logged on user to see limited personal data (the names and email addresses) of other users in that organisation. He/she will only be able to see the names and email addresses of people in other organisations if an explicit business relationship has been established between them. For example, a client receiving service from a partner will be able to see the basic contact information of an engineer that has been assigned to work on their premises.
- b) Passwords held within our database are hashed. A YCI administrator cannot determine the actual password for any system user and cannot therefore masquerade as that user. A user is responsible for setting his/her own password directly. This is never made visible to a third party (including a YCI admin) even during the initial user setup process.

7.3.5 Logging all activity on our digital services (including activity by YouCall-it.com staff) for auditing purposes.

7.3.6 Classifying information held according to both the type of data and the class of individual requesting access.

8. **Do We Share Your Data?**

- 8.1 The primary use of the data that we hold is to facilitate business interactions between our users; clients, service partners and other involved 3rd parties. By default, we will share your data with them as a consequence of organising business activity on your behalf.
- 8.2 We will share information only to the degree necessary to facilitate a particular business activity which is expected or has been pre-agreed with you.
- 8.3 We will not share information that we may hold beyond that required to facilitate an agreed business activity without first seeking your permission.
- 8.4 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority.
- 8.5 We may sometimes contract with third parties to supply products and services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.
- 8.6 We may compile statistics about the use of Our Digital Services including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

9. **What Happens If Our Business Changes Hands?**

- 9.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.
- 9.2 In the event that any of your data is to be transferred in such a manner we will endeavour to inform all active users in advance. When contacted you will not, however, be given the choice to have your data deleted or withheld from the new owner or controller.

10. **How Can You Control Your Data?**

- 10.1 In addition to your rights under the GDPR, set out in section 4, when you submit personal data via Our Digital Services, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls

on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do at any time using the functionality provided within the service portal.

11. **Your Right to Withhold Information**

11.1 You may access certain areas of Our Digital Services without providing any data at all however, to use all features and functions available within Our Digital Services you may be required to submit or allow for the collection of certain data.

12. **How Can You Access Your Data?**

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the Data Protection Act 1998, We require the payment of a small fee which will not exceed GBP 25 per user. Please contact Us for more details at info@youcall-it.com or using the contact details below in section 14.

13. **Our Use of Cookies**

13.1 Our Digital Services may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We will only use Cookies to facilitate and improve your experience of Our Sites and to provide and improve Our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

13.2 By using Our Sites, you may also receive certain third-party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. Third Party Cookies are used on Our Sites for anonymised traffic accounting only. These Cookies are not integral to the functioning of Our Sites and your use and experience of Our Sites will not be impaired by refusing consent to them.

13.3 All Cookies used by and on Our Sites are used in accordance with current Cookie Law.

13.4 Before Cookies are placed on your computer or device, you will be shown a pop-up message requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. For some of Our Sites, refusal to accept cookies will prevent access as, in these cases, cookies are deemed to be an integral part of the technology and “strictly necessary”.

13.5 The following first party Cookies may be placed on your computer or device:

Name of Cookie	Purpose	Strictly Necessary
TestCookieExist	Verification of user cookie compliance	Yes
YCICookieCompliance4	Verification of user cookie compliance	Yes
.AspNet.Cookies	Used for session authentication and control	Yes
.AspNet.ApplicationCookie	Used for session authentication and control	Yes

- 13.6 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- 13.7 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Sites more quickly and efficiently including, but not limited to, login and personalisation settings.
- 13.8 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.]

14. **Contacting Us**

If you have any questions about Our Digital Services or this Privacy Policy, please contact Us by email at info@youcall-it.com or by any of the other means listed in section 2 above. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12, above).

15. **Changes to Our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on public web portal and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Digital Services following the alterations. We recommend that you check this page regularly to keep up-to-date.