

PIPE & PIPER PRIVACY POLICY

INTRODUCTION

Welcome to Pipe & Piper's privacy policy. This privacy policy will tell you:-

- how we look after personal data when you deal with us or visit our website at <https://pipeandpiper.co.uk> (**Our Website**) or if you use an app, website or cloud based software in relation to which we provide technical services (such as hosting).
- about your privacy rights
- how the law protects you.

Pipe & Piper Limited respects personal privacy and is committed to protecting personal data and fully complying with its legal obligations under the GDPR and the Data Protection Act 2018.

1. Purpose of This Privacy Policy

This privacy policy aims to give you information about how Pipe & Piper Limited collects and processes personal data when you deal with us, use **Our Website** or you use an app, website or cloud based software in relation to which we provide technical services.

It is important that you read this privacy policy together with our **Data Retention and Destruction Policy, Information Security, Confidentiality & Access Policy**, and our **Cookie Policy**, so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies that we may issue from time to time and is not intended to override them.

2. Who are Piper & Piper Limited

Pipe & Piper Limited (Pipe & Piper) is a company which was incorporated in March 2013 in England and Wales under No. 08457992 and whose registered office is at Control Tower, Sheffield Business Park, Europa Link, Sheffield S9 1XZ.

The business of Pipe & Piper is web design, search engine optimisation (SEO), mobile app design and development, the design of content management systems, CRM and enterprise cloud systems and software, IT consultancy and auditing, hardware purchasing and support and hosting.

3. Contacting Pipe & Piper

You can contact Pipe & Piper by writing to us at the above address, or by emailing us at info@pipeandpiper.co.uk or by calling us on 0114 2555 855.

4. Who is responsible for the management of data protection at Pipe & Piper?

We have appointed **Matt Abrams** as our data protection officer. Mr. Abrams is responsible for the management of data protection at Pipe & Piper and for dealing with any questions you may have in relation to this privacy policy. He can be contacted using the contact details given in sections 2. and 3. above.

5. What sort of personal data do we hold and collect?

Personal data means any information about an individual (a data subject) from which that person can be identified. It does not include data from which the identity of an individual cannot be identified (anonymous data).

Almost all the personal data we process relates to customers of our clients.

Pipe & Piper hosts cloud based apps, websites, software and content management systems for its clients which may collect personal data relating to the users (**User Personal Data**) of such systems of the following types:-

- **Identity Data** including, for example, people's first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** including, for example, people's address, billing, delivery or email address and people's mobile and landline telephone numbers.
- **Financial Data** including, for example, people's bank account and payment card details.
- **Transaction Data** including, for example, details about payments made by and to people and other details of products and services they have purchased from our customers.
- **Technical Data** including, for example, internet protocol (IP) addresses, people's login data, browser type and version, time zone settings and location, browser plug-in types and versions, operating system and platform, and other technology on the devices people use to access our customer's websites.
- **Profile Data** including, for example, people's username and password, purchases or orders made by people, people's interests, preferences, feedback and survey responses].
- **Usage Data** including, for example, information about how people use **Our Website**.
- **Marketing and Communications Data** including, for example, people's preferences in relation to receiving marketing communications from our customers and third parties and people's communication preferences.

Our access to **User Personal Data** is strictly limited as set out in our Data Security, Confidentiality & Access Policy [[link to policy](#)].

In relation to **User Personal Data** Pipe & Piper is the data processor and not the data controller. A data processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller. Processors are separate legal entities to the controller which act on behalf of, and only on the instructions of, the relevant controller and do not have any purpose of their own in processing the data. Processors cannot take any of the overarching decisions, such as what types of personal data to collect and what it will be used for.

In addition Pipe & Piper holds personal data relating to our clients and potential clients who visit **Our Website (Client Personal Data)**. For our Clients we hold the following types of personal data: **Identity Data, Contact Data, Financial Data, Transaction Data, Technical Data, Profile Data, Usage Data and Marketing and Communication Data**. In relation to potential clients who visit **Our Website** we only hold **Technical Data**. In relation to all **Client Personal Data** Pipe & Piper is, for the purposes of data protection legislation, the controller. A controller is a "natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data". In short we determine why such personal data is being processed and how.

6. How do we collect personal data

We collect **User Personal Data** as a result of providing services (for example hosting websites and apps and cloud based software on servers we control) to our customers of the type described in section 2 above.

We use different methods to collect **Client Personal Data** from and about our clients and potential clients who visit **Our Website** including the following:-

- **Direct interactions.** Client may give us their Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data our clients provide when they become clients of Pipe & Piper or give us feedback or contact us.
- **Automated technologies or interactions.** As clients and potential clients interact with **Our Website**, we may automatically collect Technical Data about their equipment, browsing actions and patterns. We may collect this personal data by using cookies, server logs and other similar technologies. Where **Our Website** uses cookies we will obtain user consent prior to obtaining any personal data relating to such users by their use: see our **Cookie Policy**.

7. How do we use personal data?

We will only process personal data when the law allows us to.

In relation to **User Personal Data**, our activities are limited to holding, storing and making back up copies of such data (for data security purposes) as required and permitted by the contracts we have in place with our clients from time to time.

Most commonly, we will use **Client Personal Data** in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with a client.
- Where it is necessary for our legitimate interests (or those of a third party) and the client's interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

8. The legal basis on which Pipe & Piper processes personal data

The law on data protection provides a number of different grounds that a company such as Pipe & Piper can rely on to make its processing of personal data lawful.

Pipe & Piper relies on the following four legal grounds to process **Client Personal Data**:-

Our Clients have consented to our using their personal data

We can collect and process personal data with the consent of our clients.

This will be the case if our clients have provided their details to us historically for the purposes of our dealing with them.

Pipe & Piper's Contractual Obligations

In certain circumstances, we can process **Client Personal Data** to comply with our contractual obligations.

Pipe & Piper's legitimate interests

The law states that in specific situations, Pipe & Piper can process **Client Personal Data** to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact the rights, freedoms or interests of our clients.

Legal compliance

If complying with legal obligations upon us requires us to, we may collect and process **Client Personal Data**.

The legal basis on which we process **User Personal Data** is to comply with our contractual obligations with our clients. Our clients have contracts with the users of their systems that permit them to authorise us to process such **User Personal Data**.

9. Marketing

We won't share **Client Personal Data** with any third party for marketing purposes without first obtaining our client's express opt-in consent. Our Clients can ask us or third parties to stop sending them marketing messages at any time by following the opt-out links on any marketing message sent to them or by contacting us at any time.

We never share **User Personal Data** with any third party for marketing purposes.

10. How we protect personal data

We treat all personal data we process with the utmost care and take all appropriate steps to protect it.

We have put in place appropriate security measures to prevent any personal data we process from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We regularly monitor our computer systems for possible vulnerabilities and attacks and use state of the art firewalls and anti-virus software, which is regularly updated: see our **Information Security, Confidentiality & Access Policy**.

In addition, we limit access to any personal data we process to those employees, agents, contractors and other third parties who have a business need to access it. They will only process such 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 data subjects and any applicable regulator of a breach where we are legally required to do so: see our **Information Security, Confidentiality & Access Policy**.

11. Data breaches

In the unlikely event that there were to be any unauthorised access to (or an event occurs that creates a real risk of any unauthorised access to) any personal data which Pipe & Piper holds, then Pipe & Piper will, if it considers that the such events give rise to a high risk of affected individuals being adversely impacted, notify the affected individuals as soon as reasonably practicable.

12. How long will we keep personal data?

We retain **User Personal Data** for periods agreed with our clients from time to time and in accordance with relevant data protection legislation.

We will only retain **Client Personal Data** for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. Generally under the law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years for tax purposes. See our **Data Retention Policy**.

We may retain **Client Personal Data** for a longer period in the event of a complaint or if we reasonably believe that there is a prospect of litigation in respect to our relationship with a client.

To determine the appropriate retention period for any particular type of Client Personal Data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of such personal data, the purposes for which we process such personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

At the end of the retention period, personal data will be deleted completely.

For more information please see our **Data Retention & Destruction Policy**.

In some circumstances data subjects can ask us to delete their data.

13. Who do we share personal data with?

We never share **User Personal Data** with any third party. Our clients can access the **User Personal Data** relating to the users of the services they provide to such users.

Pipe & Piper may share **Client Personal Data** with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may disclose **Client Personal Data** to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Pipe & Piper or substantially all of its assets are acquired by a third party, in which case personal data held by it about the users of this Site will be one of the transferred assets.

If we are under a duty to disclose or share **Client Personal Data** personal data in order to comply with any legal obligation or to protect the rights, property, or safety of Pipe & Piper or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

14. Where personal data may be processed

We will only process personal data within the EEA. The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway.

If personal data is stored on a cloud based server that may be located outside the EEA. We would only use such a server if our contractual relationship with the cloud services provider ensured sufficient protection of personal data.

Personal data may also be processed by staff operating outside the EEA who work for us or for one of our business partners. We will take all steps reasonably necessary to ensure that personal data is treated securely and in accordance with this privacy policy and the law.

15. What rights do people have in relation to their personal data?

People generally have the legal right to request:

- Access to the personal data we hold about them.
- The correction of personal data relating to them when incorrect, out of date or incomplete.

- That we stop using their personal data for direct marketing.
- That we stop any consent-based processing of their personal data after they withdraw that consent.
- That any decision made based solely on the basis of automatic processing of their data (i.e. where no human has yet reviewed the outcome and criteria for the decision) is reviewed by a human being.
- A copy of any information about them which Pipe & Piper holds at any time, and also to have that information corrected if it is inaccurate.

If data subjects wish to exercise any of the rights set out above, they should contact our Data Protection Officer, whose details are set out in paragraphs 2 and 3 above.

No Fee Usually Required

Data subjects will not have to pay a fee to access their personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if the request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with such a request in these circumstances.

What We May Need From a Data Subject

We may need to request specific information from a data subject to help us confirm their identity and ensure their right to access personal data (or to exercise any of their 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 such a data subject to ask them for further information in relation to their request to speed up our response.

Time Limit to Respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if the request is particularly complex or the data subject has made a number of requests. In this case, we will notify the data subject and keep them updated.

16. Third party websites

Our Website may, from time to time, contain links to and from websites run by third parties. If a user of **Our Website** follows a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before submitting any personal data to these websites.

17. Changes to our privacy policy and data subject's duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on 30th July 2019. Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to data subjects by email. Please check back frequently to see any updates or changes to our privacy policy.

It is important that the personal data we hold about data subjects is accurate and current. If you are a client of Pipe & Piper please keep us informed if your personal data changes during your relationship with us.

18. Contacting the regulator to make a complaint

Data subjects have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority in relation to data protection issues (www.ico.org.uk). If a data subject feels that their data has not been handled correctly, or is unhappy with our response to any requests they have made to us regarding our use of their personal data, they have the right to lodge a complaint with the Information Commissioner's Office. We would, however, appreciate the chance to deal with any such concerns before you approach the ICO so please contact us in the first instance.

The ICO can be contacted by calling 0303 123 1113 or by going online at www.ico.org.uk/concerns.

If a data subject is based outside the UK, they have the right to lodge a complaint with the relevant data protection regulator in their country of residence.

19. Further information

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to info@pipeandpiper.co.uk.