

# Privacy Notice

Here at Concero we understand the responsibility that you have entrusted to us, to protect and respect your privacy. We are committed to processing your data securely and transparently.

This Privacy Notice and any other documents referred to within, sets out the basis on which personal data we collect from you, or that you provide to us, will be processed. It explains why we use this data, the reasons why we may need to share your personal data with others, and how we store your personal data securely. This also applies to any data collected through your use of our website, for example, when you may be 'curious' and submit a form of interest to us.

Our customers are at the heart of Concero and we want you to feel that your data is secure by understanding our views and practices regarding your data and how we will treat it. The policy may be updated as we respond to any changes in legislation and increasingly innovating ways of working which continue to emerge. We have separate privacy notices for job applicants and employees.

If we wish to use your personal data for a new or specific purpose in the future, which is not covered by this Data Privacy Notice, we will provide you with a new notice explaining this new notice prior to processing and explaining what we are collecting, why we need the data and the processing conditions so that you remain fully aware of how your personal data is being used.

## Who are we?

We are Concero Technology Services! We are a friendly Technology Services Company based in Wolverhampton, focused on providing the very best services and support to the Education and SME Sectors. We are here to support you, using IT.

We are compliant with the ISO 9001 Quality Management, and ISO 27001 Information Security, standards.



Concero are a registered Company, Company number: 06673066, and our registered office: Suite D, The Westlands, 132 Compton Road, Wolverhampton, WV3 9QB.

## Contact us!

**If you would like to talk to us about our Privacy, you can contact us with the details below and the Data Representative will get in touch with you:**



[compliance@concerouk.com](mailto:compliance@concerouk.com)



0333 111 0004

## Some definitions...

Data Controller	A controller determines the purposes and means of processing personal data.
Data Processor	A processor is responsible for processing personal data on behalf of a controller.
Data Subject	Natural person

Categories of Data	Personal data and special categories of personal data.
Personal Data	Any information relating to an identifiable person who can be directly or indirectly identified in particular by a reference to an identifier (Article 6 of GDPR), for example a name (person/school), home address, private email address. Online identifiers include IP addresses and Cookies.
Special Categories	Sensitive categories of personal data (Article 9 of GDPR), specifically including genetic data, and biometric data where processed to uniquely identify an individual. Other examples of this type of data include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs. We do not process special category data relating to our customers or suppliers.
Processing	Any operation or set of operations which is performed on personal data or on sets of personal data, whether by automated means or not, such as collection, recording, organisation structuring, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Third Party	A natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor are authorised to process personal data.

## What does this mean to you?

It means that the Company is acting in accordance with the General Data Protection Regulations (GDPR) which saw changes to Data Protection legislation in March 2018. Under the GDPR laws we can only process personal data if we have a valid reason to.

Depending on the circumstances under GDPR, Concero (the "Company", "we", "us" or "our" or any of our trading names) may be considered as both Data Controller and Data Processor of your personal information.

## What information is being collected?

We hold and process data relating to current, former and prospective customers and suppliers. This is done so in accordance with our ISO accredited Information Security Policy and Data Retention Policy.

Initially this may be through our website where the details will be provided directly by you, including; School or Business Name, job title, postcode, first name, last name, email address, phone number and an outline of your query which could contain further personal data. Or we may receive referrals or recommendations from existing customers and suppliers or other professional acquaintances. To properly support you, if we enter into a contract with you, you may be requested to provide further data.

In the event that you contact us, we retain any correspondence, queries and support requests that you may make. We may also keep details of your visit to our websites, such as traffic and location data.

If we support your IT network and infrastructure, any data that you put on your network is your own and not subject to Concero's Privacy Notice or their other policies. We must inform you that although we do have access to any data on a network that we support, we will never access it without your prior permission and consent.

We will act in accordance with the regulations surrounding education and as required by the DfE. We take a robust approach to access and use of the data and only process as required for the fulfilment of the service. Where Concero is acting on the instruction of a school, the lawful basis will be determined by the nature of the request due to the governance surrounding education and that in many cases, their lawful basis for processing is public interest.

## What's your data used for?

We will only use your personal data when the law allows us to and have outlined our legal basis for processing.

**Performance of a Contract**, whereby processing your data is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into a contract. Where we need to collect your personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested we may not be able to perform the contract we have or are trying to enter into with you, for example to provide you with goods or services. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time. We would endeavour to take all efforts to work with you and avoid this situation from occurring.

**Legitimate Interest** is the interest of our business in conducting and managing our business to enable us to give you the best service/product and the most secure experience. We make sure that we consider and balance any potential impact on you 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 permitted by law).

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

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending marketing communications. See who has access to data for further details.

We've listed below the ways we plan to use your personal data so you have a clear idea of what we do with it and why we ask for it, and the legal basis we rely on for these. We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using that data.

Purpose/Activity	Data Type	Lawful Basis for Processing
To register your query or submission of interest with the Company and allow us to identify our service users/To register you as a new customer	Identity Contact	Performance of a contract with you
To take efforts to ensure that we provide you with a high level of customer support, including dealing with any requests or ongoing queries you may have. Conducted using a variety of communications (telephone, email, helpdesk and ticketing system)	Identity Contact Profile	Legitimate interest of our business
To process your order including a) Managing payments, fees and charges b) Collect and recover money owed to us c) Delivering the service	Identity Contact Profile Marketing/Communications	Performance of a contract with you Legitimate interest of our business
Ongoing administration of the service to comply with any legal obligations we may have relating to the service	Accounting records Billing and payments	Performance of a contract with you, Legal Obligation

<p>To manage the relationship with you and offer tailored support as part of the IT support service</p> <p>To keep you informed of any changes we may make to your subscribed to services, such as (but not limited to) pricing or terms and conditions. So that we can offer you the best equipment and competitive prices, the procurement team may need to share some of your data with data with approved suppliers in order to quote and order on your behalf.</p> <p>For ad hoc services such as accredited training (and certification)</p> <p>Asking you to leave a review or take a survey</p>	<p>Identity</p> <p>Contact</p> <p>Profile</p> <p>Marketing/Communications</p>	<p>Performance of a contract with you (to provide you with the service you registered for against the SLA)</p> <p>Legal Obligation</p> <p>Legitimate interest of our business (to study how customers use our products and services and continue to expand on this offering)</p>
<p>1. Installations AT SITE – Equipment installations (Audio Visual equipment, infrastructure or a client computer)</p> <p>2. Network upgrade/server recovery or upgrade</p>	<p>Contact</p> <p>Billing and payments</p> <p>(No other data handled)</p> <p>All data types (only in cases such as corruption of data, or an issue stemming from the original data source e.g. a virus in user account)</p>	<p>Legitimate interest of our business, performance of a contract with you (to deliver a service). Data will not be removed from site without prior consent and is copied to your own equipment</p> <p>Legitimate interest of our business (to be able to be able to complete the service offered to you and resolve the issue)</p>
<p>To administer and protect our business and the Company website (including troubleshooting, data analysis, website performance, testing, system maintenance, support, reporting and hosting of data). To protect, investigate and deter against unauthorised or illegal activity.</p>	<p>Identity</p> <p>Contact</p> <p>Technical</p>	<p>Legitimate interest of our business (for running our business, provision of administration and IT services, to prevent fraud)</p> <p>Legal obligation</p>
<p>To use data analytics to improve our website, products and services, marketing, customer relationships and experiences</p>	<p>Technical</p> <p>Usage</p>	<p>Legitimate interest of our business (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you. To review effectiveness of our marketing campaigns and analyse demographic trends. For product introductions with third parties</p>	<p>Identity</p> <p>Contact</p> <p>Technical</p> <p>Usage</p>	<p>Legitimate interest of our business (to develop our products/services and grow our business)</p>

	Profile	
For research or statistical analysis (where data will be used in an anonymised manner)	We also use aggregated data (statistical or demographic) for any purpose which is automatically collected about you when you access our website. Aggregated data may be derived from your personal data but is not considered to be personal data in law as it does not directly or indirectly reveal your identity. If this type of data is combined with your personal data, so that you would be identifiable, this data will be treated in accordance with this privacy notice.	
Cookies	<p>Our website uses analytics cookies for the purpose of tracking the performance of our website and understanding more about what is of interest to those who visit our website. We may log information using cookies which are small data files stored on your browser which store visitors' preferences and record user-specific information on what pages users access or visit.</p> <p>We do not and will not ever use cookies to identify individuals and we do not store personal information in the cookies. We do not believe that our use of analytic cookies in this way poses any threat to your personal privacy or online security.</p>	

### Who has access to your data?

We know that it a natural concern to wonder who can see your data, or that you may have responsibilities as a Data Controller yourself.

We have introduced appropriate technical and organisational measures to protect the confidentiality, integrity and availability of your data during storage, processing and transit. Part of our processing utilises automated procedures. We perform regular and extensive testing of our automated procedures to make sure they perform exceptionally all the time, however in rare circumstances this may result in unexpected results, at no point should these threaten the privacy of your data.

We may have to share your data for the purposes set out in the table above, or to comply with a legal obligation upon us. Data may be shared internally with colleagues where it is necessary for them to undertake their duties and with the third-party groupings identified below.

#### External Third Parties

We have to work closely with a number of third-party organisations whose services we use within our websites and support packages, in order to run as a business and to provide you with a wider range of services.

We require all third parties to respect the privacy of your personal data and treat it in accordance with the law. We do not allow our third-party service providers to use your data for their own purposes and only permit them to use the data for a specified purpose in accordance with our instructions or notification. Some third parties themselves may be acting as the Data Controller and providing information to us, and as such will have their own Privacy Notices which we are not responsible for.

We would advise you to read these as we do not accept any responsibility for any third party's use of your data or their use of cookies collected in this sense. Where links may be used to other websites, this does not imply that they are endorsed by Concero and may have been provided for your convenience. We have no control over the content of other websites.

\*Providers and approved suppliers acting as processors who provide IT and system administration services. Our Internet Service Providers (ISP) are selected [and checked] and you will be made aware

who your provision is with. There will be a requirement to share some of your data to enable you to receive the services.

\*Professional advisors acting as processors including lawyers, bankers, auditors and insurers, HM Courts and Tribunal Services, based in the UK who provide professional services as required and instructed by the Company.

\*HM Revenue and Customers, regulators and other authorities acting as processors based in the UK who require reporting of processing activities in certain circumstances.

## Marketing

Our legal basis for processing your personal data for marketing purposes is your consent for us to use it in accordance with this privacy policy. You will be required to confirm that you agree to receive other communications from Concero and for us to store and process personal data, or have the option to opt out by indicating your marketing preferences.

You have the right to ask us to not process your information for marketing purposes and can unsubscribe at any time. We would like to inform you of our products and services and other content which we feel may be of interest to you via marketing and would hate for you to miss out. However, you do have the unrestricted right to withdraw that consent at any time and can ask us or third parties to stop sending you any marketing communications. Should you make the decision to opt out of any marketing communications, this will not apply to any data provided to us as a result of any other service or product which you have signed up for. You have the right to withdraw consent to marketing at any time by contacting us on [compliance@concerouk.com](mailto:compliance@concerouk.com).

## Cloud

Using Microsoft Office 365, the Company offers cloud storage solutions such that your data is hosted and managed online and stored on servers. Microsoft has clear and transparent information about their data practices and compliance with GDPR and how they implement the appropriate technical measures to assist us in supporting you and to enable us to deliver a service to you. Concero has been assessed and selected as a key partner for the Platform Provisioning Programme and any processing as part of this service will be done in accordance with this privacy statement.

## Where do we keep your data?

Your data is a prime concern to us and we strive to use services that are as stringent as ourselves. We use several servers based in the UK, EEA and USA depending on the services, all of which are held in, either Tier IV or Tier III+, PCI DSS or ISO 27001 compliant facilities. Any and all data transferred to the US, is done so in a secure fashion using the EU-US or Swiss-US Privacy Shield Frameworks.

The laws in countries outside of the EEA may not be able to provide your data with the same protection as within the EEA. However, any third party outside the EEA dealing with EEA data they too, are bound by GDPR and have agreed to abide by EEA levels of data protection in regard to transfer, processing and storage of any personal data.

By providing your data to us, you agree to this transfer and storage. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process the data and whether we can achieve those purposes through other means, in line with applicable legal requirements.

We will put in place appropriate security measures to protect your data, to prevent it from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Reasonable steps are taken so that your personal data will only be retained for as long as necessary to fulfil the purposes it was collected for, including for the purpose of satisfying any legal, accounting or reporting requirements. For example, by law we have to keep basic information about our customers, such as financial and transaction data for six years after they cease being customers for tax purposes.

## Accessing and updating your data

Under data protection law, your data must be up to date and accurate. We ask that you maintain your data including but not limited to name, address, email address and telephone details so that we are able to fulfil the requirements of the service.

## Your rights and the right to be forgotten

Under data protection law, you have the following rights with respect to your personal data;

1. The right to request a copy of the personal data which we hold about you.
2. The right to request that we correct any personal data if it is found to be inaccurate or out of data.
3. The right to request your personal data is erased where it is no longer necessary to retain such data.
4. The right to withdraw your consent to the processing at any time, where consent was your lawful basis for processing the data.
5. The right to request that we provide you with your personal data and where possible to transmit that data directly to another data controller (known as data portability) – i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means.
6. The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
7. The right to object to the processing of personal data – i.e. where processing is based on legitimate interests (or the performance of a task is in the public interest/exercise of official authority).

If you would like to enact any of your rights under the GDPR please contact us at [compliance@concerouk.com](mailto:compliance@concerouk.com) and we will respond to your request within one month. Occasionally it may take us longer than a month if your request is particularly complex or there are a number of requests. If this is the case, we will notify you and keep you updated. We may need specific information from you to help us confirm your identity as a security measure to ensure that data is not disclosed incorrectly.

Whilst we would endeavour to avoid this, it may be necessary to charge a reasonable administration fee for a request which may be considered unfounded, repetitive or excessive, or in cases where additional copies are required. In extreme circumstances, based on the nature of the request, we may refuse to comply.

Concero will endeavour to enact your right which you have requested and cooperate with any requests. We would hope that we would be able to resolve any data issues based on the strong relationships which we have with our customers. However, there are some examples outlined below whereby the request may be challenged.

\*Where you wish to exercise the right to be forgotten (right to be deleted). The Company may have to retain your details on file in line with Legal Obligations which therefore negates this option.

\*In preventing the use or processing of data, it may prevent or delay us from fulfilling our contractual obligations to you. Dependent on the information withheld, it may mean that we will not be able to provide our services to you.

## Data Breaches

In the unfortunate event of a data breach we shall ensure that our obligations under GDPR will be followed where necessary as outlined in the GDPR Data Breach Policy.

## Not happy how we do things?

If you find yourself in the unfortunate situation where you are not happy with how we have handled and processed your personal information, please let us know so we can improve or offer you reassurance about the handling of your data. **Please in the first instance contact our Data Representative at the [compliance@concerouk.com](mailto:compliance@concerouk.com).**



If you do not feel that your complaint or concern is resolved, we would like to remind you that you have the right to make a complaint to the Information Commissioners Office.

<https://ico.org.uk/concerns/>

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113

Email: <https://ico.org.uk/global/contact-us/email/>