

INNOVATION SYSTEMS & DESIGN LIMITED
GENERAL PRIVACY NOTICE AND WEBSITE COOKIES POLICY

GENERAL PRIVACY NOTICE

Introduction

Welcome to the general privacy notice for Innovation Systems & Design Limited (**Company**).

The Company respects your privacy and is committed to protecting your personal data. This privacy notice informs you as to how we collect and use your personal data and tells you about your privacy rights and how the law protects you. This privacy notice is provided in a layered format for ease of use.

Please note that we do not knowingly collect data relating to children.

1. IMPORTANT INFORMATION

Purpose of this privacy notice

As stated above, this privacy notice aims to give you information on how the Company collects and uses your personal data, including (but not limited to) any data you may provide through our website (<http://www.dynodevelopments.co.uk/>), by telephone or by email when you (or somebody else) purchases a product or service from the Company or make enquiries in relation to the same.

It is important that you read this privacy notice so that you are aware of how and why we are using your data. This privacy notice supplements any other privacy notices which we may publish from time to time and is not intended to override them.

Controller

The Company (also referred to as **we, us** or **our** in this notice) is a limited company incorporated in England and Wales with number 05088340 whose registered office is Pt Unit 2, Bowman Trading Estate, Bessemer Drive, Stevenage, Hertfordshire, SG1 2DL. We are also authorised by the Financial Conduct Authority with reference number 719073. For the purposes of data protection laws, the Company is the controller and responsible for your personal data.

If you have any questions about this privacy notice, including any requests to exercise your legal rights (see further below), please contact Jennifer Gurney using the details set out below.

Contact details

If you have any questions about this privacy notice or our privacy practices, please contact Jennifer Gurney in the following ways:

Email address: jennym@dynodevelopments.com

Postal address: Pt Unit 2, Bowman Trading Estate, Bessemer Drive, Stevenage, Hertfordshire, SG1 2DL

Telephone number: 01483 600208

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues (address: Wycliffe House, Water Lane, Wilmslow Cheshire SK9 5AF; telephone: 0303 123 1113; website: www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please consider contacting us in the first instance.

Who this notice is addressed to

Data protection laws afford individuals certain privacy rights. In this notice, references to **you** or **your** are to the individuals (known as **data subjects**) whose personal data the Company processes. Please note that personal data does not include information about non-natural persons (such as companies and other bodies corporate). This notice explains (amongst other things) how we may process personal data about data subjects supplied to us by one or more third parties. Therefore, our customers, suppliers and other third parties with whom we do business should read and digest this notice. Whoever provides us with personal data concerning one or more other data subjects (such as officers and employees) must ensure that they have the legal right to pass that data to us before doing so and make such data subjects aware of this notice before doing so in order for them to understand how their personal data might be used by us.

Changes to the privacy notice and your duty to inform us of changes

We keep this privacy notice under regular review. This notice was last updated on 05 Jan 2019.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third party links and websites/applications

Please note that our website may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third party websites and are not responsible for their privacy notices. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Please also note that if we correspond with you via WhatsApp, Facebook, etc., the privacy notice of the relevant data controller will apply in connection with any such correspondence – again, we encourage you to read the privacy notice of each such website/application before you correspond with us in this way.

2. THE DATA WE PROCESS

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed.

During the course of operating our business, we may collect, use, store and transfer different kinds of personal data about you. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Please see below a table which summarises (i) the types of personal data we process, (ii) how we collect that data, (iii) how we use that data, (iv) who we share that data with and (v) what the lawful basis for our processing of that data is:

Types of personal data we process	How we collect that personal data	How we use that personal data	Who we share that personal data with	What the lawful basis for our processing of that personal data is
<p>Your personal details including name, title, address, telephone numbers and email addresses.</p> <p>Business information such as job title, name of employer, details of business, and other information provided in the course of the relationship between you/your organisation and us, or otherwise voluntarily provided by you/your organisation to us.</p> <p>Financial information including payment details, bank account details, source of funds, credit information, credit/debit card numbers, security codes and other related billing information.</p> <p>Any other personal data you choose to give us when contacting/engaging us or which is provided to us by a customer in the course of</p>	<p>When you seek the supply by us of goods and/or services or engage us to supply goods and/or services.</p> <p>When we carry out due diligence on you or your organisation (such as credit reference checks).</p> <p>When corresponding with us (including by telephone, email, post or via our website).</p> <p>By using our website, it may automatically collect technical data using cookies (see further below).</p> <p>Publicly accessible resources such as Companies House.</p> <p>Financial and transaction data from providers of technical, payment and delivery services.</p> <p>From a third party with your consent such as your</p>	<p>To register you as a customer (if applicable).</p> <p>To provide and administer or supply of goods and services to our customers.</p> <p>To run our business affairs.</p> <p>To administer and manage our relationship with our customers and suppliers and taking other steps linked to the performance of our business relationship, such as identifying persons authorised to represent our customers and suppliers.</p> <p>To deal with your query in the event that you contact us.</p> <p>To comply with our legal and regulatory obligations.</p> <p>To send business or marketing communications (such as information about the goods and services which we offer) which we think may</p>	<p>Your information will be processed by our officers, employees and consultants in order for us to carry out and manage our business activities.</p> <p>We may also share your personal data with third parties, including (i) couriers/delivery companies, (ii) contractors or agents working on our behalf (such as our professional advisers or auditors), (iii) credit reference or fraud and crime prevention agencies, (iv) regulatory bodies (as required by law), (v) third party service providers who perform functions on our behalf, (vi) courts, law enforcement authorities, regulators, government officials or other parties where it is reasonably necessary for the establishment, exercise or defence of a legal claim, or</p>	<p>Your relationship with us will determine why we collect particular information about you. When we process data about individual customers, the principal basis is that it is necessary for us to perform a contract with you.</p> <p>We may be required by law to collect certain information.</p> <p>In some circumstances, we may process your personal data for our legitimate business interests.</p> <p>If your data is provided to us by a third party (such as one of our customers), we will process your personal data on the basis of the relevant customer's legitimate interests in obtaining goods and/or services from us.</p>

<p>obtaining goods and/or services from us.</p> <p>Operational personal data such as CCTV footage, recordings of telephone conversations or logs of visitors and notes of meetings.</p> <p>Information from cookies on our website (see further below).</p>	<p>employer.</p>	<p>be of interest.</p> <p>To understand how individuals use our website and to provide a good user experience.</p> <p>For insurance purposes and to manage our own liability.</p> <p>To facilitate your access to any of our on-site facilities.</p> <p>Any other processing for which you have given your consent (e.g. receiving marketing information).</p>	<p>for an alternative dispute resolution process and (vii) third parties to whom we may choose to sell, transfer, or merge parts of our organisation/assets.</p> <p>We may also share your personal data with finance companies, but only with your consent.</p>	
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We do not collect any **special categories** of personal data about you (such as details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

We may however collect, use and share **aggregated data** such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

If you fail to provide personal data

Where we need to collect 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.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

3. INTERNATIONAL TRANSFERS

We do not in general transfer your personal data outside the European Economic Area (**EEA**), although our website is accessible outside of the UK/EEA. If you are based outside the EEA, we may (for example, during correspondence with you) need to transfer your personal data outside the EEA, but we will only do so in line with data protection laws and usually where this is necessary for the performance of a contract between you and us, or for pre-contractual steps taken at your request.

4. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your 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 you and any applicable regulator of a breach where we are legally required to do so.

5. DATA RETENTION

How long will you use my personal data for?

We will only retain your 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. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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

6. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

Your rights

You have the right to:

Request access to your personal data (commonly known as a **data subject access request** or **DSAR**). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.

- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

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

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your 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 you to ask you for further information in relation to your 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 your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

WEBSITE COOKIES POLICY

Introduction

Welcome to the website cookies policy for the website (<http://www.dynodevelopments.co.uk/>) (**Website**) operated by Innovation Systems & Design Limited (**Company, we and us**).

The Website incorporates StatCounter, a piece of software licensed to us by Statcounter Limited (see: <https://statcounter.com/>). This helps us to provide you with a good experience when you browse the Website and also allows us to improve the Website.

When you use the Website:

- The information recorded by StatCounter consists of the date and time of visit, your IP address, browser (e.g. Firefox 3.5), operating system version (e.g. Windows XP), screen resolution (e.g. 800x600), referring link, the current page URL and the current page title.
- To enable StatCounter to track whether you have been to the Website before, a cookie is sent to your computer/device. A cookie is a small file of letters and numbers and contain information that is transferred to your computer's hard drive if you agree to the same. This information is collected solely to improve StatCounter services and for statistical purposes

and is not used to identify individuals. Because such cookies are used by a third party, we have no particular control over these.

No other cookies are used as part of the Website.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies.