### Website

- 1. The Data Gardener website does not collect much information about you as a visitor to our website.
- 2. Where we do collect your information, we tell you why we need it. We only use information gathered from the website for obvious purposes. For example, if you request information, we need to know who you are and how to contact you, so we ask for that information.
- 3. We do not keep credit card details and we do not share customer details with any 3rd parties.
- 4. You are able to update details about you and your organisation on the website. We use this information to keep the **business contact information** we hold about you up to date.
- 5. We only use cookies for temporary purposes, they expire when you leave the site. This allows us to improve your experience of our website. For example, one area of the website needs you to log in. When you have logged in we keep information to save further identity verification. We also use Google Analytics to understand how you use the website, so we can improve it.
- 6. This information is not disclosed to anyone.
  - The legal basis for processing your data is 'contract'. You are entering into a contract to use the website, and we are contracting to make that possible, any cookies are necessary for this contract. Your browser may additionally ask for your consent to use cookies on the website. By logging in you enter into a contract for which cookies are required, consent to cookies being used is an artefact of web browsers.
  - This information is stored in your web browser and destroyed at the end of your session.
  - If you wish to contact us, our details are on the **contact page**.
  - If you feel we are not being fair with you, please tell us, we would like to correct this.
  - You may complain to the UK regulator, Information Commissioners Office (www.ico.org.uk).

### **Business Contact Information**

- 1. We may hold business contact data about you if you are a decision maker in a UK organisation. We provide this information to others for direct marketing of their products or services. Your data can only be used where the product or service might be relevant to you in your professional capacity.
- 2. We want to respect your wishes about how and if you are contacted. We record how you prefer to receive direct marketing, whether by post, by phone or by email. You may also tell us you do not wish to be contacted at all, and we will respect your wishes.
- 3. The personal data we hold is your name, job title, and maybe your work email address.
- The legal basis for processing your data is 'legitimate interest', because Data Gardener benefits from licensing direct marketing data.
- We do not use your personal data for any automated decision making or profiling.
- Your rights concerning your personal data are:
  - you can ask to see the personal data we hold about you and we will show you,
     free of charge
  - o we will update the personal data to correct errors when you tell us about them
  - we will supply you with a CSV version of the personal data we hold about you if you ask us to
  - o we will stop processing your personal data if you tell us to
  - we will delete your personal data if you tell us to. The law says we must not contact you again if you ask us not to. This means we might need to keep your contact details to make sure this happens.
- We collect your personal data by telephoning your organisation. We ask you how you
  prefer to receive professionally relevant direct marketing. If we do not speak to you we
  will take this data from a colleague who says they have the authority to tell us. If we
  gained our information from your colleagues, and we hold an email address for you, we
  will confirm your preferences with you by email.
- We will update your details and preferences and will remind you of your rights regularly.
- If you wish to know even more about how we research and maintain your data, or how we ensure you only receive professionally relevant direct marketing, click here.
- Where Data Gardener has provided another company with a licence to use your data for marketing, we insist they continue to respect your preferences for as long as the licence is

valid. In addition, when the license is no longer valid, the company using your data is required to delete it. If you do not feel this has been done, please contact us.

- If you wish to contact us, our details are on the contact page.
- If you feel we are not being fair with you, please tell us, we would like to correct this.
- You may complain to the UK regulator, Information Commissioners Office ( www.ico.org.uk ).

#### **Customers**

- 1. We hold information about customers to enable us to contact you.
- 2. The personal information we hold is your name, job title, and maybe your work email address.
- 3. We do not store credit card details and we do not share customer details with any 3rd parties.
- 4. We will continue contacting you after you have stopped being an active customer. We may continue to do so for two years after your last invoice. After this point we will either delete your data, or keep it because you have asked us to.
- 5. This information is only disclosed to employees of Data Gardener and contracted processors. For example, this may be an agency who sends mail for us. It is possible we might need to disclose this information for legal purposes.
- The legal basis for processing your data is 'contract' while you are a customer. When you are no longer an active customer, it is 'legitimate interest'. Data Gardener benefits from licensing direct marketing data and would like you to order again.
- We do not use your personal data for any automated decision making or profiling.
- Your rights concerning your personal data are:
  - you can ask to see the personal data we hold about you and we will show you,
     free of charge
  - o we will update the personal data to correct errors when you tell us about them
  - we will supply you with a CSV version of the personal data we hold about you if you ask us to
  - o we will stop processing your personal data if you tell us to
  - we will delete your personal data if you tell us to. The law says we must not contact you again if you ask us not to. This means we might need to keep your contact details to make sure this happens.
- If you wish to contact us, our details are on the contact page.
- If you feel we are not being fair with you, please tell us, we would like to correct this.
- You may complain to the UK regulator, Information Commissioners Office (www.ico.org.uk).

# **Suppliers**

- 1. We hold information about suppliers to enable us to contact you.
- 2. The personal information we hold is your name, job title, and maybe your work email address.
- 3. We will continue to hold your personal details for two years after your last invoice to us. After which we will either delete your personal data, or keep it because you have asked us to.
- 4. This information is only disclosed to employees of Data Gardener and contracted processors. For example, this may be an agency who sends mail for us. It is possible we might need to disclose this information for legal purposes.
- The legal basis for processing your data is 'contract' while we are your customer. When you are no longer an active supplier, it is 'legitimate interest' because we may want to order from you again.
- We do not use your personal data for any automated decision making or profiling.
- Your rights concerning your personal data are:
  - you can ask to see the personal data we hold about you and we will show you,
     free of charge
  - o we will update the personal data to correct errors when you tell us about them
  - we will supply you with a CSV version of the personal data we hold about you if you ask us to
  - o we will stop processing your personal data if you tell us to
  - we will delete your personal data if you tell us to. The law says we must not contact you again if you ask us not to. This means we might need to keep your contact details to make sure this happens.
- If you wish to contact us, our details are on the contact page.
- If you feel we are not being fair with you, please tell us, we would like to correct this.
- You may complain to the UK regulator, Information Commissioners Office (www.ico.org.uk).

## **Employees**

- 1. We hold information about employees of Data Gardener to enable us to employ, pay and manage your work. We might also hold information about a next of kin in case of emergencies.
- 2. While you work with Data Gardener we will keep information about your time and attendance. This is also used to keep you safe in case of fire. We hold information about your recruitment, about training and development, and about your performance. We also use security cameras for security purposes. We might keep information about disciplinary proceedings.
- 3. Next of kin information is destroyed when you stop working with Data Gardener. Other records are held for longer, including the dates of your employment so we can provide references.
- 4. This information is not normally disclosed to anyone except Human Resources, Department Managers and Board Members of Data Gardener.
- 5. In case of a dispute, or for legal purposes, we may need to disclose this information to the authorities or to other legal professionals.
- The legal basis for processing your data is 'contract' whilst you are an employee, sometimes 'legal requirement' in case of certain records, such as payroll. Where we hold next of kin information, it is on the basis of 'consent'.
- We do not use your personal data for any automated decision making or profiling.
- Your rights concerning your personal data are:
  - you can ask to see the personal data we hold about you and we will show you,
     free of charge
  - o we will update the personal data to correct errors when you tell us about them
  - we will supply you with a CSV version of the personal data we hold about you if you ask us to
  - o we will stop processing your personal data if you tell us to
  - we will delete your personal data if you tell us to. The law says we must not contact you again if you ask us not to. This means we might need to keep your contact details to make sure this happens.
- If you wish to contact us, our details are on the contact page.
- If you feel we are not being fair with you, please tell us, we would like to correct this.

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