

Issued By Brian McGillivray, Data Protection Officer 17/05/2018

Introduction

This policy sets out the different areas where user privacy is concerned and outlines our requirements & obligations toward our customers and the services we provide. Furthermore, the way we process, store and protect user data and information will also be detailed within this policy.

Services

To be able to provide our services we may require personal information which will only ever be used for the purposes of providing those services.

Accuracy and relevance

Navertech will ensure that any personal data processed is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained. Navertech will not process personal data obtained for one purpose for any unconnected purpose, unless the individual concerned has agreed to this or would otherwise reasonably expect this.

Individuals may ask that we correct inaccurate personal data relating to them. If you believe that your information is inaccurate you should record the fact that the accuracy of the information is disputed and inform us on 01847 892892 or dpo@navertech.com.

Data security

Navertech must keep personal data secure against loss or misuse. Where other organisations process personal data as a service on our behalf, the DPO (Data Protection Officer) will establish what, if any, additional specific data security arrangements need to be implemented in contracts with those third-party organisations.

Our website(s)

Navertech take a proactive approach to user privacy and ensure the necessary steps are taken to protect the privacy of its users throughout their visiting experience. Our website(s) comply with all UK national laws and requirements for user privacy.

Use of cookies

What are cookies?

Cookies are small files saved to the user's computer's hard drive that typically track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within this website.

What do we use cookies for?

We may use cookies to remember personal settings you have chosen at our website. In no other context do we use cookies to collect information that identifies you personally. Most of the cookies we set are automatically deleted from your computer when you leave our website or shortly afterwards.

We use anonymous session cookies (short-term cookies that disappear when you close your browser) to help you navigate the website and make the most of the features. If you log into one of our hosted services or websites as a registered user, your session cookie will also contain your user ID so that we can validate which services you have access to.

Our website uses tracking software to monitor its visitors and to better understand how they use it. This software is provided by Google Analytics and Hotjar which use cookies to track visitor usage. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information.

Should users wish to deny the use and saving of cookies from this website onto their computer's hard drive, they should take necessary steps within their web browser's security settings to block all cookies from this website and any external serving vendors.

Personal information

Whilst using our website, software applications or services, you may be required to provide personal information (name, address, email, account details, etc.). We will use this information only for the purposes of providing any requested services and products to you. We will ensure that all personal information supplied is held securely in accordance with the General Data Protection Regulation (EU) 2016/679, as adopted into law of the United Kingdom in the Data Protection Act 2018. Further, by providing telephone, fax and email details, you consent to Navertech contacting you using that method.

You have the right at any time to request a copy of the personal information we hold about you. Should you wish to receive a copy of this, or would like to be removed from our database, please contact us on 01847 892892 or dpo@navertech.com.

Information collection and use

Navertech will not sell or rent any personally identifiable information that you provide us, to anyone.

How do we collect information?

Navertech collects information in two ways:

a. When you directly give it to us ("Directly Provided Data")

When you sign up on one of our websites, purchase our products or communicate with us, you may choose to voluntarily give us certain information – for example, by filling in text boxes or completing website forms. All this information requires a direct action by you at that time in order for us to receive it.

b. When you give us permission to obtain from other accounts ("User Authorised Data")

Depending on your settings or the privacy policies for other online services, you may give us permission to obtain information from your account with those other services. For example, this can be via social media or by choosing to send us your location data when accessing our website from your smartphone.

How long do we keep your data for?

Navertech will not retain your personal information longer than necessary. We will store the information you provide either while your account is in existence, or as needed to be able to provide the Services to you, or (in the case of any contact you may have with our Customer Care team) for as long as is necessary to provide support-related reporting and trend analysis only.

If legally required or if it is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our Terms and Conditions, we may also retain some of your information for a limited period of time as required, even after you have closed your account or it is no longer needed to provide the Services to you.

Sub-processors

We currently use third party Sub processors to provide infrastructure services, and to help us provide customer support and email notifications. Prior to engaging any third-party Sub processor, we perform diligence to evaluate their privacy, security and confidentiality practices, and execute an agreement implementing its applicable obligations.

Infrastructure Sub processors

We may use the following Sub processors to host Customer Data or provide other infrastructure that helps with delivery of our Services:

Entity Name	Sub processing Activities	Entity Country
Fasthosts	Domain Registrar	United Kingdom
123-Reg	Domain Registrar	United Kingdom
Nominet	Domain Registry	United Kingdom
ICANN	Domain Registry	United States
Heart Internet	Internet Service Provider	United Kingdom
Redstation	Internet Service Provider	United Kingdom
34SP	Internet Service Provider	United Kingdom
Avast	Anti-Virus Service Provider	Czech Republic
Stripe	Payment Service Gateway	United States
Paypal	Payment Service Gateway	United States
Fusemail	Internet Service Provider	United States
Microsoft	Internet Service Provider	United States/United Kingdom

Other Sub processors

We may use the following Sub processors to perform other Service functions:

Entity Name	Sub processing Activities	Entity Country
Freshdesk Inc.	Cloud-based Customer Support Services	United States
Gotoassist.	Cloud-based Remote Support Tool	United States
Dropbox	Cloud-based Storage Service	United States
Slack	Messaging Tool	United States
LastPass	Secure Password Management Tool	United States

Choosing how we use your data

We understand that you trust us with your personal information and we are committed to ensuring you can manage the privacy and security of your personal information yourself. With respect to the information relating to you that ends up in our possession, and recognising that it is your choice to provide us with your personally identifiable information, we commit to giving you the ability to do all of the following:

- You can verify the details you have submitted to Navertech by contacting our customer service team on 01847 892892 or dpo@navertech.com. Our security procedures mean that we may request proof of identity before we reveal information, including your e-mail address and possibly your postal address.
- You can also contact us by the same method to change, correct, or delete your
 personal information controlled by Navertech at any time. Please note though that,
 if you have shared any information with others through social media channels, that
 information may remain visible, even if your account is deleted.
- You are also free to close your account with us by getting in contact with us to arrange any services or products to be cancelled, and any outstanding invoices paid. However, we may retain archived copies of your information as required by law or for legitimate business purposes (including to help address fraud and spam).
- You can unsubscribe from receiving Navertech marketing emails from us by clicking the "unsubscribe" link at the bottom of any email. Once you do this, you will no longer receive any marketing emails from us.
- You can request a readable copy of your personal data at any time. To do this, please contact us on 01847 892892 or dpo@navertech.com.

Please note, we are constantly reviewing how we process and protect data. Therefore, changes to our policy may occur at any time. We will endeavour to publicise any changes on our website.

