

# DRUMAINN LIMITED Privacy Notice

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Welcome to the Drumainn Limited's (Drumainn) privacy notice.

This privacy notice provides information on how Drumainn collects and processes your personal data when you visit our website [to sign up for a newsletter, enquire about our professional services, or otherwise correspond with us during the course of our working relationship].

It is important that you read this privacy notice together with our website privacy policy which contains more detailed information about our data processing and can be accessed here.

## 1. Important information and who we are

Drumainn is the controller and responsible for your personal data.

### CONTACT DETAILS

Our full details are:

Drumainn Limited

Email address: info@drumainn.com

Postal address: 25 St Thomas Street, Winchester SO23 9 HJ

Telephone number: 07836 330666

## 2. The data we collect about you

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

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **"Identity Data"** includes first name, last name, title, and gender.
- **"Contact Data"** includes email address and telephone numbers.
- **"Financial Data"** includes bank account and payment details.
- **"Transaction Data"** includes details about payments to and from you and other details of services you have contracted to receive from us, to the extent that any of this information comprises 'personal data'.
- **"Profile Data"** includes business statistics, published facts and figures.
- **"Marketing and Communications Data"** includes your preferences in receiving marketing from us and your communication preferences.

We do not collect any **"Special Categories of Personal Data"** about you (this includes 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.

## 3. How we use your personal data and our legal gateway

We will only use your personal data for the purpose for which we collected it which includes the following:

- to manage your relationship with us and

- for us to carry out services to you under the contract between us.

The legal gateway that we rely on in order to process your personal data is that we have a legitimate interest in processing the personal data which is not overridden by your rights and freedoms as a data subject.

#### **4. How we share your personal data**

We may share your personal data with external 3<sup>rd</sup> parties but only with prior agreement or where we have a legitimate interest in doing so, for example, in order for us to carry out our professional services under the contract between us, or where we are required to by law or other regulation. Please note that we do share your personal data with our legal advisers, our accountant and our service providers.

In assessing our legitimate interest, we have considered your rights and freedoms as a data subject.

#### **5. Data retention**

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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for ten years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: as detailed below.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

#### **6. International transfers**

We may transfer, store and process your personal data outside the European Economic Area (EEA). This is done at our clients' discretion and on their instructions in relation to the particular contract under which we are providing services. In instances where these transfers take place, the client will be responsible for deciding upon the means by which the transaction and all personal data involved will be protected. Please rest assured that we will use our best efforts to ensure that appropriate safeguards are put in place prior to any such transfers taking place.

#### **7. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data including the right to receive a copy of the personal data we hold about you and the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). For further information about the rights that you have as a data subject, please see the ICO's website.

## **8. Further details**

If you are looking for more information on how we process your personal data, please contact us through the website <https://www.drumainn.com>

21 June 2018