

## **Privacy Policy – Crafted Syntax Limited**

*Updated 23rd October 2018*

Crafted Syntax Limited is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you in accordance with data protection law, including the General Data Protection Regulation (GDPR) and the Data Protection Act (DPA) 2018.

Crafted Syntax Limited ("we", "us", "our") is a data controller. This means that we are responsible for deciding how we hold and use personal information about you.

We are required under data protection legislation to notify you of the information contained in this privacy notice. It is important that you read this notice, so that you are aware of how and why we are using your information.

### **Data Protection Principles**

We'll comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
4. Accurate and kept up to date.
5. Kept in a form that identifies you for only as long as necessary for the purposes we have told you about.
6. Kept securely.

### **The Kind of Information We Hold 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 process data about:

- customers/clients
- employees
- job applicants

We collect, store and use certain categories of personal information about you such as:

- personal contact details, e.g. name, telephone numbers and email addresses
- application data, e.g. work experience, education and right to work

We'll also collect, store and use certain special categories of more sensitive personal information — which require a higher level of protection — such as:

- unspent criminal convictions (later stages of recruitment process)

## **How Your Personal Information is Collected**

We collect personal information directly from you in circumstances such as:

- whenever you contact us
- request a quote or estimate
- apply for a job

We **don't** collect personal information from third parties.

## **How We Use Your Information**

We'll only use your personal information when the law allows it. Most commonly, we'll use your personal information where:

- we need to comply with a legal obligation

- it's necessary in order to fulfil contractual obligations between us, or it is a prerequisite to a contract (e.g. providing a quote)

In limited circumstances we'll ask you for your consent to use your personal information, but your consent is not required if any of the above apply.

### **Situations in Which We'll Use Your Personal Information**

We'll process your personal information when carrying out our responsibilities in relation to:

- customer management
- account related notices
- job applications

### **Automated Decision Making**

Automated decision making is **not** carried out.

### **Data Sharing**

We will, when legally required, share your data with third parties, including:

- law enforcement agencies (e.g. police)
- public or governmental authorities

### **Use of Third Party Service Providers**

We use or work with contractors and other third party service providers who will process personal data on our behalf.

Those third parties are our data processors and can only process personal data on our instructions or with our agreement.

All our third party service providers are required to take appropriate security measures to protect your personal information in line with our policies.

We do not allow our third party service providers to use your personal data for their own or other purposes.

## **Transfer of Information Outside the EU**

When we do so we'll ensure that we'll meet our obligations under the GDPR and DPA 2018.

## **Data Security**

We treat the security of your data very seriously. We have strict security standards and regular training about how to keep information safe.

We have put in place appropriate technical, physical and managerial procedures to safeguard and secure the information we collect about you. In addition, we limit access to your personal information to those persons, or agents who have a business or legal need to do so.

We have put in place procedures to deal with any suspected data security breach and will notify you and the regulator of a suspected breach where we are legally required to do so.

## **Data Retention**

### **How Long We'll Use Your Information**

We aim to retain your personal information for only as long as it is necessary for us to do so for the purposes for which we are using it.

In some circumstances we'll anonymise your personal information so that it can no longer be associated with you, in which case we will use such information without further notice to you.

### **Rights of Access, Correction, Erasure, and Restriction**

You have a number of rights in relation to the processing of your personal information by us. These are outlined below.

### **Your Responsibility to Inform Us of Changes**

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

### **Your Rights in Connection with Personal Information**

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a subject access request) — this enables you to know what personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you — this enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information — this enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. This does not apply where we are legally obliged to process your personal information or where the processing is necessary for performing our functions. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing.
- Object to processing of your personal information where you have grounds to object which relate to your particular situation, in which case we will stop processing the personal data unless we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms.
- Request the restriction of processing of your personal information — this enables you to ask us to suspend the processing of personal information about you, for example if you want to establish its accuracy or the reason for processing it.

### **Right to Withdraw Consent**

We usually process personal data because we are required to do so by law, or because it's part of our contractual obligations with you.

In the limited circumstances where you have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

We'll have told you how to withdraw your consent when you provided it and you should follow that process. If not, contact us specifying how and when you provided your consent, and for what purpose.

Once we've received notification that you have withdrawn your consent, we'll no longer process your information for the purpose or purposes you originally agreed to, unless we have another legal basis for doing so in law.

### **Contact Crafted Syntax Limited or Make a Complaint**

If you have any questions about this privacy notice or how HMRC handles your personal information, please contact us at [dataprotection@craftedsyntax.com](mailto:dataprotection@craftedsyntax.com) or write to:

*Crafted Syntax Limited  
SIF 8, The Workstation  
15 Paternoster Row  
SHEFFIELD  
S1 2BX*

You also 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.

### **Contact the ICO**

You can contact the Information Commissioner:

- telephone: 0303 123 1113 (local rate)
- email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

Alternatively, you can write to:

*The Information Commissioner  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF*

*The Information Commissioner's website has more information about data protection and your rights.*

## **Cookies**

We use cookies — small files stored in the browser — to collect anonymised information about how visitors browse our site.

## **Website Traffic and Usage (Google Analytics)**

We use Google Analytics to collect anonymised information about how people interact with our website. We do this to help make sure that we meet the needs of our users and to help us make improvements.

No personal information is collected.

Google Analytics stores information about:

- what pages are viewed
- how you reached our site, e.g. through social media
- how long you spend on the site

Visit [Google Analytics Cookie Usage on Websites](#) for more information on the cookies set/used by Google Analytics.

You can opt out of [Google Analytics](#).

## **Changes**

We keep our privacy notices under regular review. If there are any changes, e.g. new uses of personal data, we will update this page to tell you.

Check this page to make sure you are aware of what information we collect, how we use it and the circumstances we may share it with other organisations.

*This privacy notice was last updated on 23rd October 2018.*