



Technology is in our DNA

Privacy Policy

This Privacy Policy was last updated: 9th October 2019

Introduction

At Xiria, we are committed to privacy and transparency. We want you to clearly understand how your data is used, and provide clarity on the control you have over that data.

We appreciate you putting your trust in us concerning your personal data, and encourage you to read this Privacy Policy carefully as it describes how we collect, use, and disclose your personal data. Personal data is any information relating to a living person.

In this Privacy Policy, when we refer to “we”, “our”, “us”, or “Xiria”, we mean Xiria Ltd, a company registered in England, registration number 8673536.

Updates to our Privacy Policy

As our business changes and grows, we may need to make changes to the way we collect and use your personal information. As a result of this, this Privacy Policy may be updated from time to time. Should we make changes to this Privacy Policy, the latest version will always be published on our website.

How to contact us

If you have any questions about this Privacy Policy or if you would like to make a request relating to your personal data, please contact us using the details in the section below. Our email address for such matters is dpo@xiria.co.uk

Data Controller

For purposes of this Privacy Policy the Data Controller is:

Xiria Ltd, Unit 2A, Stanhope Gate, Stanhope Road, Camberley, Surrey, GU15 3DW

Data Protection Officer

You can reach our Data Protection Officer at:

Xiria Ltd, Unit 2A, Stanhope Gate, Stanhope Road, Camberley, Surrey, GU15 3DW.

Your legal Data Protection rights

Under certain circumstances, you have legal rights under data protection laws in relation to your personal data. These include the right to:

Access. You have the right to request a copy of the personal data we are processing about you, which we will provide back to you in electronic form. For your own privacy and security, at our discretion we may require you to prove your identity before providing the requested information. If you require multiple copies of your personal data, we may charge a reasonable administration fee where we are permitted to do so in accordance with the GDPR.

Rectification. You have the right to have incomplete or inaccurate personal data that we process about you rectified. Note that you can always make certain adjustments to certain personal data directly by contacting us.

Erasure. You have the right to request that we erase personal data that we process about you, except we are not obligated to do so if we need to retain such data in order to comply with a legal obligation or to establish, exercise or defend legal claims.

Restriction. You have the right to restrict our processing of your personal data where you believe such data to be inaccurate, our processing is unlawful, or that we no longer need to process such data for a particular purpose, but where we are not able to delete the data due to a legal or other obligation or because you do not wish for us to delete it.

Portability. You have the right to obtain personal data we hold about you, in a structured, electronic format, and to transmit such data to another data controller, where this is (a) personal data which you have provided to us, and (b) if we are processing that data on the basis of your consent (such as for direct marketing communications) or to perform a contract with you.



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Objection. Where the legal justification for our processing of your personal data is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defence of a legal claim.

Withdrawing Consent. If you have consented to our processing of your personal data, you have the right to withdraw your consent at any time, free of charge. This includes cases where you wish to opt out from marketing messages that you receive from us. You can unsubscribe from marketing communications at any time by following the instructions in any individual message. The legality of the processing of your personal data prior to you withdrawing your consent remains unaffected by this.

You can make any of these requests in relation to your personal data by submitting your request in writing or by email using the contact methods outlined earlier in this document.

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

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.

We try to respond to all legitimate requests within one month. Occasionally it may 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.

You also have the right to lodge a complaint with the local data protection authority if you believe that we have not complied with applicable data protection laws. The Information Commissioner's Office (ICO) is the UK supervisory authority for data protection issues (www.ico.org.uk). We would be grateful if you contact us first if you do have a complaint so that we can try to resolve it for you.

The Information Commissioner's Office can be contacted as follows:

Telephone: +44 303 123 1113

Email: casework@ico.org.uk

Website: www.ico.org.uk

Web-form: www.ico.org.uk/concerns/

Address: Water Lane, Wycliffe House, Wilmslow, Cheshire, SK9 5AF

Sensitive Data

We do not routinely collect any Sensitive Data about you. Sensitive data refers to data that 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. We do not collect any information about criminal convictions and offences.

However, should you visit our offices or data centre premises, in order to be granted access to these facilities, you may be required to provide biometric data in the form of an iris scan or fingerprint. Prior to any access being granted, we will obtain a signed confirmation of your explicit consent

All employees of Xiria are required to undergo and maintain BPSS certification. Customers requiring more frequent or unescorted access to our Data Centre sites will be required to undergo a detailed security assessment or BPSS check which may require references and background checks to be carried out. This is primarily for our List X government locations.

Data Security

All hosted services operated by Xiria operate exclusively from UK based data centres on Xiria owned infrastructure. We have significant physical and electronic controls combined with appropriate security measures in place 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 such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.



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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.

How we protect your Personal Data

Your personal data will only ever be stored on systems either hosted by Xiria or by a trusted third party, such as our online accounting or CRM applications. All online services are accessed using SSL encryption methods, with two-factor authentication where possible.

We regularly review the security controls in place with our limited number of third party suppliers and update our Data Audit records to reflect any changes.

Disclosures of your Personal Data

We may have to share your personal data with the parties set out below.

- I. Service providers who provide IT and system administration services.
- II. Professional advisers: including lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance, and accounting services.
- III. HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- IV. Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

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

Purposes for processing your Personal Data

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

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 email us at dpo@xiria.co.uk if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to recover debts owed to us



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To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to study how customers use our products/services, to develop them and grow our business
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud, and in the context of a business reorganisation or group restructuring exercise (b) Necessary to comply with a legal obligation
To deliver relevant content and advertisements to you and measure and understand the effectiveness of our advertising	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy
To use data analytics to improve our products/services, marketing, website, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests to develop our products/services and grow our business

Marketing communications

You will receive marketing communications from us if you have:

- I. requested information from us or purchased goods or services from us; or
- II. if you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications; and
- III. in each case, you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

You can ask us or click the unsubscribe option on any of our marketing emails.



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Where you opt out of receiving our marketing communications, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

How we use your Personal Data

We are required by law to provide you with information about the purposes for which we use your information and the legal justification for us to use that information. For example, there may be a legal justification for us to use your personal data where:

- I. We need to use your information to perform a contract with you or to fulfil a request originated by you.
- II. You have given your consent to us using your information.
- III. Using your information is in our legitimate business interests (provided these interests are balanced against your rights).
- IV. We need to process your personal data to comply with legal or regulatory obligations to which we are subject.

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us using the methods outlined earlier in this document or by following the automated process on all our marketing communications.

Information we collect

- 1) Information you give to us.
We may collect personal data from you when you attend Xiria events, visit our offices, sign up to our newsletters or subscribe to our services, enter into offers or promotions, interact with us on social media platforms, contact us via phone or our websites.
The categories of personal data we may request include your name, occupation, contact information (email, postal address and phone/mobile number), We may also keep copies of any correspondence you send us which may include personal data.
You should only give us personal data on behalf of someone else if you have their permission to do so or you know that they would not have any objection to us processing their information in accordance with this Privacy Policy.
- 2) Information collected by automated means.
We also obtain some of your personal data by automated means, for example, should you visit our offices and connect to our IT systems we collect activity data, when you enter zones at our premises monitored by CCTV, when you telephone our office or support services your calls are recorded and when you visit our websites we collect the IP address of the device you use to connect to the Internet, the geographical location of your device, the browser you are using, the type of device you are using (tablet, mobile, desktop), the URL you came from and the web pages you access.
- 3) Information collected from third parties.
We may request information about you from credit reference agencies and fraud prevention agencies to assist us in the provision of our goods and services to you.
We will always take steps to ensure that your personal data is only used for the purposes you have consented to. You can opt out from receiving our marketing communications at any time by following the instructions in any of the messages you receive.
We will never knowingly collect personal data from individuals under the age of sixteen (16) without first obtaining verifiable parental consent. If you are under the age of 16 you should not provide information to us. If we become aware that a person under 16 has provided personal data to us without verifiable parental consent, we will remove such personal data from our records.

Cookies

When visiting our website, Cookies, which are small text files, can be stored on your device in order to offer you certain functionality, to make the Website more convenient, and to optimise our website. If you do not want cookies to be used, you can disable them by configuring the relevant settings in your web browser or by using separate opt-out options. Please note that this may restrict the functionality and your use of our website, and certain features may not work as a result.

Online Content Contributions

If you choose to contribute to a social, community, or other publicly available area or feature of our website, the information you submit may be made available to the general public depending on your settings (which is why we recommend that you do not submit or post any personal data to such forums, such as your full name, home address, phone number and/or other information that would enable others to contact or locate you).

Data Processing in Non-EU Countries

Most third parties with whom we share data are located within the European Economic Area ("EEA"), but some may process your personal data outside of the EEA.



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If data is transferred to organisations which are based in, or whose data processing takes place in a jurisdiction which is not a member of the European Union or a member state of the EEA, before transferring the data we will ensure (unless a legally applicable exemption applies) that the recipient has an appropriate level of data protection in place (e.g. through a determination of adequacy by the European Commission, through appropriate guarantees such as the recipient being self-certified for the EU-US Privacy Shield, or an agreement in the form of the EU standard contractual clauses with the recipient).

We can provide you with an overview of the recipients in non-EU jurisdictions and a copy of the measures which have been put in place to ensure an adequate level of data protection applies.