Privacy Policy

Secure Data Management Privacy Policy
In this Privacy Policy the terms, 'we' or 'us' is Secure Data Management. We are registered with the UK Information Commissioner's Office (ICO) as
a **data controller** under registration number Z1724373.

Your privacy is important to us and we are committed to keeping your information secure and managing it in accordance with our legal responsibilities under applicable data protection laws.

Please read this Privacy Statement carefully as it contains important information to help you understand how and why we process any personal information that you give to us.

What Information we collect
We process personal information which you give us:

- As a customer to provide you with document storage, archiving and document destruction services you have requested
- Whilst servicing your account in writing, by email or over the phone
- If you request information or assistance from us
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What personal information we process
We will collect your employee's name, email address, job title, telephone number and any other information you or your employee may disclose.

Special Categories of Personal Data
Special categories of personal data include information about an individual's health and other categories of personal information which are closely protected.

We do not generally process such information unless you or your employees have voluntarily provided this to us. For example, where your employee has advised us of a health issue, which could mean that they may be classed as a "vulnerable". We will process sensitive information where you or your employees have voluntarily provided this information to us and have agreed that we can use this information to deliver services to

you. Where possible we shall seek to minimise the collection and use of such special categories of personal data.

How we use your Information

We use your information to:

- provide you with archiving, document storage and document destruction services
- provide and service your account

We will process your information where we have a legitimate interest to do so, where you provide your consent, where we are permitted by law or to comply with applicable law and regulation.

PURPOSE	LEGAL BASIS
Providing a service and internal processing	
To assess your needs and provide you with suitable products and services	· Necessary for performance of a contract. · Where special categories of personal data are processed, these are necessary to assess your needs
To service and administer your account	· Legitimate interests to provide and manage the service
To confirm, update and improve our customer records	· To comply with legal obligations in the Data Protection regulations
To provide you with information on the services that you have requested	· Legitimate interests to provide information on the services you have requested
Relationship Management	
To manage and develop our relationship with you and inform you of products and services which may be of interest to you.	· Legitimate interest to service your account and improve our service to you
Training and development	
For training purposes and to improve our service to you	· Legitimate interests to improve our services and develop our employees

Complying with Legal Obligations	
If we are obliged to disclose information by reason of any law, regulation or court order	· To comply with legal obligations
Other	
To transfer information to any entity which may acquire rights in us	· Legitimate interests for commercial interests
For any other purpose to which you agree.	· With your consent

How we retain your personal information

We will retain your personal information in accordance with applicable laws. We will take reasonable steps to destroy or anonymise personal information we no longer need for the purposes we have set our above.

Our retention periods are:

Type of personal Information	Retention Period
General personal data which includes normal personal data and personal identity data	· 7 years after the end of our relationship with you
Call Recordings	· 7 years
Special categories of personal data	· Until you inform us that you no longer need us to retain the information or · 7 years after the end of our relationship with you

How we share your information

Where necessary or required we share information with Our appointed IT contractors, and third-party data centres to manage our IT infrastructure.

Information Security
We invest appropriate resources to protect your personal information, from loss, misuse, unauthorised access, modification or disclosure. However, no internet-based site can be 100% secure and we cannot be held responsible for unauthorised or unintended access that is beyond our control.

Updates
We will keep this Privacy Statement under review and make updates from time to time. Any minor changes to this Privacy Statement will be posted on this page and we will communicate any major changes to you.

Your Rights
You have the right to request copies of your personal information within our custody and control and details of how we use that information. If you think any of the personal information we hold about you is inaccurate, you may also request it is corrected or erased.

You also have a right, in certain circumstances, to object to our processing of your personal information, to require us to stop processing your personal information and/or to withdraw your agreement to processing based on 'consent', but this does not apply where we have other legal justifications to continue processing your data or an overriding legitimate interest.

In relation to all of these rights, please write to us at the address below.

Complaints Process
If you have a complaint about how we have handled your personal information you may contact us using the details below and we will investigate your complaint. You also have the right to complain to the Information Commissioner's Office (https://ico.org.uk), which regulates the processing of personal data.

Contact Us
You can contact us by writing to:

Secure Data Management
645 Portslade Road,
London,
SW8 3DH
You can email us at operations@securedatamgt.com
Telephone queries can be made to 207 940 5050