

# PRIVACY NOTICE

Pirum Systems Ltd is committed to protecting the privacy and security of your personal information and we will always treat you and your data with the respect you deserve.

This Privacy Notice covers how we collect, use, store and disclose the personal data that we hold and your rights in respect of that data. It applies to our clients and persons our clients have authorised or directed us to interact with (including counterparties) in the course of providing services. Accordingly, references to “you” in this Notice means, as the context shall require, any such person and any individuals representing your organisation.

## THE INFORMATION WE COLLECT FROM YOU

Personal individual 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 will typically collect, store and use all or some of the following categories of personal information about you:

- contact details such as name, title, work addresses, work telephone numbers, work email addresses and other business information.

### How the information is collected

We collect personal information directly from you through our website, from your appointed administrator representing you or by direct personal request. Some information may be collected from publicly available third party sources.

### What we use your personal information for

We will use the personal information for the administration of our relationship with our client, in order to provide services in accordance with the contract with our client. We will also use personal information to comply with requirements that we are required or recommended to undertake, whether by statute or by our regulator.

### Failure to provide information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with our client.

### Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current, so please let us know if your information changes.

## DISCLOSURE/DATA SHARING

We may have to share your data with third parties, including third-party service providers (including contractors and designated agents); other entities in the group; in the context of a sale of the business; or with a regulator or to otherwise comply with the law; our insurers and/or professional advisers to manage risks and/or legal disputes.

We do this where necessary to provide services in accordance with our contract with our client; where required by law; or where we have another legitimate interest in doing so.

We require third parties to respect the security of your data and to treat it in accordance with the law.

## **Transfers of data outside of the EU**

We may transfer the personal information we collect about you outside the EU in order to perform our contract with our client. We use Microsoft Office 365 and NetSuite which covers our email servers and client relationship management systems. Further information is available from the Data Protection Officer (email: [dpo@pirum.com](mailto:dpo@pirum.com)).

## **DATA RETENTION**

We store personal information for a maximum of 10 years following the termination of our contract with you.

## **YOUR RIGHTS**

### **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 “data subject access request”). This enables you to receive a copy of the 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. 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 (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **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 us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

## **COMPLAINTS & QUESTIONS**

If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Protection Officer (email: [dpo@pirum.com](mailto:dpo@pirum.com))

If you are not satisfied by our response 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 (email: [casework@ico.org.uk](mailto:casework@ico.org.uk))

## **CHANGES TO THIS PRIVACY NOTICE**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information. This privacy notice is effective as from 25 May 2018.