

PRIVACY NOTICE- WEBSITE & MARKETING

JUNE 2020



SA GROUP
CYBER | P3M | TECHNICAL

SA-Group.com

1. INTRODUCTION

1.1.1 SA Group respects your privacy and is committed to protecting your personal data. This privacy notice will inform you about how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

2. PURPOSE OF THIS PRIVACY NOTICE

2.1.1 This privacy notice aims to give you information on how SA Group collects and processes your personal data through your use of this website and other digital marketing channels, including any data you may provide through this website.

2.1.2 It only applies to the actions of SA Group and Users with respect to this website. It does not extend to any websites that can be accessed from this website including, but not limited to, any links we may provide to social media websites or platforms.

3. DEFINITIONS AND INTERPRETATION

3.1.1 Cookies:

3.1.1.1 A small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause below (Cookies);

3.1.2 Data:

3.1.2.1 Collectively all information that you submit to SA Group Limited via the Website. This definition incorporates, where applicable, the definitions provided in the Data Protection Act 1998;

3.1.3 Data Protection Laws:

3.1.3.1 as applicable to either party and/or to the rights, responsibilities and/or obligations of either party in connection with this Agreement;

3.1.3.2 the General Data Protection Regulation (GDPR), Regulation (EU) 2016/679;

3.1.3.3 the Data Protection Act 2018;

3.1.3.4 the Directive 2002/58/EC (ePrivacy Directive) and/or the Privacy and Electronic Communications (EC Directive) Regulations 2003;

3.1.3.5 any other applicable law relating to the processing, privacy and/or use of Personal Data, as applicable to either party and/or to the rights, responsibilities and/or obligations of either party in connection with this Agreement;

3.1.3.6 any laws which implement any such laws; and

3.1.3.7 any laws that replace, extend, re-enact, consolidate or amend any of the foregoing;

3.1.4 Data Protection Supervisory Authority:

3.1.4.1 any regulator, authority or body responsible for administering Data Protection Laws;

3.1.4.2 Information Commissioner's Office (ICO) is the UK supervisory authority for data protection issues (www.ico.org.uk);

3.1.5 SA Group Limited, or us

3.1.5.1 SA Group Limited, a company incorporated in England and Wales with registered number 06866343 whose registered office is at Heywood House, Park Lane, Heywood, Westbury, Wiltshire, BA13 4NA;

3.1.6 UK and EU Cookie Law

3.1.6.1 The Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;

3.1.7 User or you

3.1.7.1 Any third party that accesses the Website and is not either (i) employed by SA Group Limited and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to SA Group Limited and accessing the Website in connection with the provision of such services; and

3.1.8 Website

3.1.8.1 The website that you are currently using, www.sa-group.com, and any sub-domains of this site unless expressly excluded by their own terms and conditions.

3.1.9 In this privacy policy, unless the context requires a different interpretation:

3.1.9.1 the singular includes the plural and vice versa;

3.1.9.2 references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;

3.1.9.3 a reference to a person includes firms, companies, government entities, trusts and partnerships;

3.1.9.4 "including" is understood to mean "including without limitation";

3.1.9.5 reference to any statutory provision includes any modification or amendment of it;

3.1.9.6 the headings and sub-headings do not form part of this privacy policy.

4. CONTROLLER

4.1.1 SA Group Limited is the “data controller” and responsible for your personal data (collectively referred to as “SAG”, “we”, “us” or “our” in this privacy notice).

5. DATA PROTECTION OFFICER (DPO)

5.1.1 We have appointed a DPO who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details below:

Chris Barnard
DPO@SA-Group.com
SA Group Ltd, Heywood House, Park Lane, Heywood, Westbury, Wiltshire, BA13 4NA.

5.1.2 You 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 (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact the DPO in the first instance.

6. THIRD-PARTY LINKS

6.1.1 This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

7. THE DATA WE COLLECT ABOUT YOU

7.1.1 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).

7.1.2 We may collect the following Data, which includes personal Data, from you:

- Name
- Job Title
- Contact Information such as email addresses and telephone numbers
- Personal data that may be included within a CV submission, via email, to SA Group

8. HOW YOUR PERSONAL DATA IS COLLECTED?

8.1.1 We use different methods to collect data from and about you including through:

- subscription to our newsletter
- request further information using our contact form
- give us some feedback

8.1.2 As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

8.2 Cookies

8.2.1 Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

8.2.2 Our website may place and access certain Cookies on your computer. SA Group Limited uses Cookies to improve your experience of using the Website. SA Group Limited has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.

8.2.3 All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.

8.2.4 Before the Website places Cookies on your computer, you will be presented with a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling SA Group Limited to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however, certain features of the Website may not function fully or as intended.

8.2.5 This Website may place the following Cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Google Analytics.** We use Google Analytics on our website to anonymously analyse the behaviour of visitors to our site. This analysis is used to improve the browsing experience on the site and to help us serve our customers better.

8.2.6 You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.

8.2.7 You can choose to delete Cookies at any time; however you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.

8.2.8 It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

9. HOW WE USE YOUR PERSONAL DATA

9.1.1 Any or all of the above Data (para 7) may be required by us from time to time in order to provide you with the best possible service and experience when using our Website. We will only use your personal data in accordance with data protection laws. Most commonly, we will use your personal data in the following circumstances:

9.1.1.1 To contact you with promotional materials that may be of interest to you;

9.1.1.2 To contact you with information about our services.

10. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

10.1.1 We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

10.1.2 Note that 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 contact us 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.

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Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer, account on website.	(a) Identity (b) Contact	Performance of a contract with you.
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 Preferences	(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 Preferences	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (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 website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	(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 website, products/services, marketing, 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 website 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)

10.2 Change of purpose

10.2.1 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

10.2.2 If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

10.2.3 Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

10.3 Disclosures of your personal data

10.3.1 We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

10.3.2 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

10.4 International transfers

10.4.1 We do not transfer your personal data outside the European Economic Area (EEA).

11. THIRD PARTY WEBSITES AND SERVICES

11.1 SA Group may, from time to time, employ the services of other parties for dealing with certain processes necessary for the operation of the Website. The providers of such services do not have access to certain personal Data provided by Users of this Website.

11.2 We will get your express opt-in consent before we share your personal data with any company outside the SA Group group of companies for marketing purposes.

11.3 Opting out. You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and amending your preferences or by contacting us at any time.

11.4 Where you opt out of receiving these marketing messages, 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.

12. EMAIL MARKETING MESSAGES AND SUBSCRIPTION

12.1 Under the GDPR we use the Legitimate Interest lawful basis for anyone subscribing to our marketing mailing list or whose data we have acquired from a reputable 3rd party partner. Any email marketing messages we send are done so through an EMS (email marketing service provider). An EMS is a third party service provider of software / applications that allows marketers to send out email marketing campaigns to a list of users.

12.2 Email marketing messages that we send may contain tracking beacons / tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of data such as; times, dates, I.P. addresses, opens, clicks, forwards, geographic and demographic data. Such data within its limitations will show the activity each subscriber made for that email campaign.

12.3 Any email marketing messages we send are in accordance with the GDPR and the PECR. We provide you with an easy method to withdraw your consent (unsubscribe) or manage your preferences / the information we hold about you at any time. See any marketing messages for instructions on how to unsubscribe or manage your preferences. Our EMS provider is Zoho. We may hold the following information about you within our EMS system;

- Full name, email address, job title and work phone number, where provided
- Company name
- I.P address
- Subscription time & date
- Information on your past engagement with our marketing activities: email marketing, social media posts, website downloads.

13. DATA SECURITY

13.1 We have put in place appropriate security measures 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. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

13.2 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.

14. DATA RETENTION

14.1 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. This period will not normally be beyond 6 months.

14.2 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.

14.3 In some circumstances, you can ask us to delete your data: see 15.1.3 for further information.

14.4 In some circumstances we may 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.

15. YOUR LEGAL RIGHTS

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

15.1.1 Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

15.1.2 Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

15.1.3 Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

15.1.4 Object to processing of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information, which override your rights and freedoms.

15.1.5 Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

15.1.6 Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

15.1.7 Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

15.1.2 If you wish to exercise any of the rights set out above, please the Data Controller, SA Group or the DPO.

15.1.3 You will not have to pay a fee to access your personal data (or to exercise any of the 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.

15.1.4 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.

15.1.5 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.

16. CHANGES TO THIS PRIVACY NOTICE

16.1.1 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 data.

16.1.2 If you have any questions about this privacy notice, please contact the DPO (details in para 5).



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