

# DATA PROTECTION POLICY

1<sup>st</sup> JULY 2015 VERSION

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## 1. ABOUT US

*InventoryGenius* is the trading name and product name used of **HUDE LIMITED** (referred to in this document as "**we**", "**us**", "**our**" or "**HUDE**"), a company registered in England and Wales, with registered number 07887472, and registered office at Suite 3, Charlton House, Raynesway, Derby DE21 7BF. Website: <http://www.Inventorygenius.co.uk/>. E-mail: [hello@Inventorygenius.co.uk](mailto:hello@Inventorygenius.co.uk). Phone Number 01332 653888. The data controller is Hudde Limited.

## 2. ABOUT THIS DOCUMENT

This document sets out our policy in relation to how we process personal data (as defined in the Data Protection Act 1998) and e-mail addresses relating to our visitors and customers (referred to in this policy as "**personal data**"), including: (a) any personal data we obtain concerning individuals who are visitors to our website (or who are representatives of our visitors); (b) any personal data we obtain concerning individuals who are our customers or business associates and suppliers of our customers, or who are their representatives; and (c) any personal data which we are to process as part of any service we provide to our customers (such as data concerning occupants of properties). References in this policy to "**you**" and "**your**" are to such individuals whose personal data we process, and references to a "**representative**" are to an officer, employee, partner, member, agent or other representative of any business or any supplier or sub-contractor of that business.

## 3. OUR COMMITMENT

We are committed to complying with the Data Protection Act 1998 in relation to any personal data we process, and The Privacy and Electronic Communications (EC Directive) Regulations 2003 in relation to any personal data that consists of an e-mail address.

## 4. WHAT INFORMATION WE PROCESS

### 4.1 Contact and Status Information

Your personal data may include identity and contact details (such as name, age, gender, address, telephone, mobile, fax, and e-mail), and any proofs of identity and address which we obtain (including copies of passports, driving licences, utility bills etc.).

### 4.2 Associated Business Information

If you are a sole trader, partner or owner of a business, or a representative of a business, we may capture and may associate with you, data concerning that business, including: (a) the business name, address and type of business, registration numbers, registered office, VAT number, business regulatory status and regulatory authorisation numbers, and payment details; (b) your position and role within that business (including job title), and your relationship in respect to the business (owner, partner, director, shareholder, employee, agent etc.).

### 4.3 Usage Information

We capture or generate and may associate with you information concerning your usage (or the usage of any business you are a representative of) of our website, services and systems, including passwords and user names, payment details, visit history, log-in history, actions taken by you using the system or services, payment history, enquires made using our system or service, and data (including property data) which you input into or otherwise process using our systems or services.

#### **4.4 Information processed for our customers**

If your personal data is being processed in or by our systems or services by a customer of ours, for instance you are an occupant of any property which is being managed by a customer of ours through our systems and services, then we may capture and associate you in our systems and services identity and contact details (such as name, age, gender, address, telephone, mobile, fax, and e-mail), and details concerning the property you are occupying (including description, condition and contents), and the basis of occupation (tenancy, lease etc.).

#### **4.5 Correspondence**

We capture and process correspondence, communications and messages between you and us.

#### **4.6 Third Party Information**

We may collect information forming part of your personal data from other sources, such as public records and regulatory and private organisations, including any information we collect to verify you and your identity, and your credit status.

#### **4.7 Technical Information**

We may collect technical information when you visit our website and use our systems and services, including your web browser information including your browser make (e.g. Internet Explorer, Firefox, Safari, Opera, Chrome), your operating system (e.g. Microsoft Windows, OSX, Android), your IP address (a unique identifier allocated to your computer for your connection to the internet), and information in relation to your use of our website, systems and services.

### **5. HOW WE COLLECT/GENERATE PERSONAL DATA**

Personal data may be collected or generated: (a) by simply visiting our website, including information automatically provided by your browser when you visit our website and information collected using any cookies or other tracking and analytical technologies we may use from time to time; (b) by submitting any form or application on our website; (c) by completing any paper forms we may supply; (d) by amending and updating any account we may provide you on our website or in our systems; (e) by your use of our website or systems including any data you input or update into our systems and websites; (f) by us in the operation of our websites and services, or in communicating with you, or searches against third part databases; (g) from anything you or the business you are a representing or any customer of ours may supply; and (h) information we generate ourselves in operating our website and providing our services and systems.

### **6. WHAT WE DO WITH YOUR PERSONAL DATA**

We use and process your personal data for the following purposes: (a) to provide, operate, administer, maintain and improve our website, systems, and services; (b) to provide information about our website, systems and services; (c) to provide, perform, administer, manage, and enforce all contracts with our customers (which may be you if you are our customer); (d) to collect payments and manage our accounts; (e) to keep internal records and maintain reasonable information archives; (f) to communicate with you concerning your use of and the provision of support in relation our website, systems and services and use by any business you are a representative of; and (g) to send you marketing materials relating to our website, systems, and services, including future websites, systems, products and services we may offer (but, only where you consented to this, and only for so long as you have not withdrawn your consent).

### **7. WHO WE DISCLOSE PERSONAL DATA TO**

We will not sell personal data. However, we may disclose your personal data to others in the following circumstances:

#### **7.1 If you are a representative**

If you are using our website, systems or services as a representative of a business, your personal data will be made available to the business you are a representative of.

#### **7.2 If you are a client of a customer**

If your personal data is being processed by us as a service to a customer of ours (or a business associate or supplier of theirs) we may make your personal data available to such persons in accordance with our contract with our customer.

### **7.3 Public forums etc.**

Where any functionality of our website or systems is clearly designed to make information public (e.g. a public forum) then any personal data you provide in relation to that functionality will be made available to the public accordingly.

### **7.4 Our contractors and suppliers**

Where we use third parties to host, provide or supply any part of our website, systems or services, or to enforce or administer any contracts, or to collect payments to be made, or otherwise to provide services to us in connection with our business, then we may provide your personal data to them as reasonably required for those purposes only.

### **7.5 Legal requirements**

We may supply your personal data to a government authority or regulator where required to comply with a legal requirement, for the administration of justice, or where reasonably required to protect your vital interests.

### **7.6 How third parties will handle your personal data**

In any case where we are providing your data to a third party, your personal data may be held by them as data processor on our behalf, in which case we will remain the data controller, and your personal data will only be held and used by them on our behalf and in accordance with our instructions and this policy. In some cases, your personal data may need to be provided to them to be used by them for their own purposes, and as a data controller, where this is reasonably necessary, such as, where required for the purposes of any instruction, or for the purposes of processing any payments; and in such case, they should inform you separately that they are holding your personal data as data controller and the details of their policy.

## **8. WHERE WE PROCESS YOUR PERSONAL DATA**

We and our contractors and suppliers normally store and process your personal data in the European Economic Area. However we and our contractors and suppliers may from time to time store and process your personal data elsewhere outside the European Economic Area. If your personal data is to be stored or processed outside the European Economic Area, we will comply with, and take all reasonable steps to ensure our contractors and suppliers comply with, the rules under the Data Protection Act 1998 for processing personal data outside the European Economic Area.

## **9. SECURITY**

We are committed to doing what we reasonably can to keep personal data secure from unauthorised access, and we have put in place reasonable physical, electronic and managerial measures with a view to safeguarding and securing personal data from unauthorised or unlawful processing and against accidental loss, damage or destruction. However, no technology or measure is absolutely secure, so we cannot guarantee that personal data will not be subject to unauthorised access. You and your employer are responsible for keeping any username and password log-in details confidential.

## **10. DATA PROTECTION AND YOUR RIGHTS**

We would like to advise you of your following rights under the Data Protection Act 1998, and if you would like to exercise any of this, please contact us through our contact details appearing above in this policy:-

### **10.1 Access to your personal data**

Under Section 7 of the Data Protection Act 1998, you are entitled to a copy of certain of that personal data, but we may charge a fee of no more than £10 for providing this information.

### **10.2 Your right to stop marketing messages**

If we are sending you marketing messages, the Data Protection Act 1998 gives you a right to ask us to stop using your personal data to do this.

### **10.3 Your right to stop use causing distress**

You have the right to ask us to stop using your personal data for any purpose that is causing you substantial distress.

**10.4 Your right to alter inaccurate data**

Under the Data Protection Act 1998 you can ask us to change, erase, block or modify any inaccuracies in your personal data.

**11. CHANGES TO THIS POLICY**

We may change this policy from time to time by publishing a new version on our website. We will not be required to inform you of this. You should check our website from time to time for updates to our policy. By continuing to use our website and services after any such change you will be considered to have accepted the change.

**12. LEGAL STATUS OF THIS POLICY**

This policy is not intended to and does not create any contract or contractual rights. Your rights in relation to this policy are limited to any non-contractual obligation of confidentiality we may have at law, and any statutory rights you may have under the Data Protection Act 1998 and the Privacy and Electronic Communications (EC Directive) Regulations 2003.