

# Privacy Policy

## BACKGROUND:

Ayooda.Com Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our clients and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

### 1. Information About Us

Ayooda.Com Ltd is “an IT Services Provider”. We are registered in England and Wales as company under number: 5671332 and our registered office is at 36 Bardolph Road, Richmond, TW9 2LH. Our main trading address is 19 Nork Rise, Banstead, SM71JN.

For the purpose of the Data Protection Legislation and this notice, we are the ‘data processor’. This means that we are responsible for processing personal data on your behalf. We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice.

### 2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

### 3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

### 4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 13.
- b) The right to access the personal data we hold about you. Part 11 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 13

to find out more.

- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 13 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 13.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

## 5. **What Personal Data Do You Collect?**

We may collect or obtain Personal Data about you: directly from you (e.g., where you contact us); in the course of our relationship with you (e.g., if you make a purchase); We may also receive Personal Data about you from third parties (e.g., government authorities).

Collection of Personal Data: We may collect Personal Data about you from the following sources:

- Data you provide: We may obtain your Personal Data when you provide it to us (e.g., where you contact us via email or telephone, or by any other means, or when you provide us with your business card).
- Files: In providing the Services, we may collect and store the files you send us for processing or information.
- Relationship data: We may collect or obtain your Personal Data in the ordinary course of our relationship with you (e.g., if you purchase a service from us)
- Registration details: We may collect or obtain your Personal Data when you authorize us to register for services on your behalf (e.g. Websites, Apps, or cloud services).
- Third party information: We may collect or obtain your Personal Data from third parties who provide it to us (e.g., credit reference agencies; law enforcement authorities; etc.).
- Payment details: invoice records; payment records; billing address; payment method; bank account number; BACS details; SWIFT details; IBAN details; payment amount; payment date; and records of cheques

## 6. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one or more of the following purposes:

- Providing and managing your account.
- Supplying our products and/or services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products and/or services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email and/or post that you have opted-in to (you may unsubscribe or opt-out at any time by emailing [privacy@ayooda.co.uk](mailto:privacy@ayooda.co.uk)).
- We may also create Personal Data about you, such as records of your interactions with us, and details of your purchase history for internal administration purposes and analysis, including to better understand your needs and interests and to personalise and improve your experience.
- With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and/or telephone and/or text message and/or post with information, news, and offers on our products and/or services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

### Lawful basis for Processing Personal Data

We may Process your personal data where: you have given your prior, express consent; the processing is necessary for a contract between you and us; the processing is required by applicable law; the processing is necessary to protect the vital interests of any individual; or where we have a valid legitimate interest in the processing.

In processing your personal data in connection with the purposes set out in this Policy, we may rely on one or more of the following legal bases, depending on the circumstances:

- Consent: We may process your personal data where we have obtained your prior, express consent to the processing (this legal basis is only used in relation to processing that is entirely voluntary – it is not used for processing that is necessary or obligatory in any way);
- Contractual necessity: We may process your personal data where the processing is necessary in connection with any contract that you may enter into with us;
- Compliance with applicable law: We may process your personal data where the processing is required by applicable law;
- Vital interests: We may process your personal data where the processing is necessary to protect the vital interests of any individual; or
- Legitimate interests: We may process your personal data where we have a legitimate interest in carrying out the processing for the purpose of managing, operating or promoting our business, and that legitimate interest is not overridden by your interests, fundamental rights, or freedoms.

## **Sensitive Personal Data**

We do not seek to collect or otherwise process your sensitive personal data. Where we need to process your sensitive personal data for a legitimate purpose, we do so in accordance with applicable law.

We do not seek to collect or otherwise process your sensitive personal data in the ordinary course of our business. Where it becomes necessary to process your Sensitive Personal Data for any reason, we rely on one of the following legal bases:

- Compliance with applicable law: We may process your sensitive personal data where the processing is required or permitted by applicable law (e.g., to comply with our diversity reporting obligations);
- Detection and prevention of crime: We may process your sensitive personal data where the processing is necessary for the detection or prevention of crime (including the prevention of fraud);
- Establishment, exercise or defence of legal rights: We may process your sensitive personal data where the Processing is necessary for the establishment, exercise or defence of legal rights; or
- Consent: We may process your sensitive personal data where we have, in accordance with applicable law, obtained your prior, express consent prior to processing your sensitive personal data (this legal basis is only used in relation to processing that is entirely voluntary – it is not used for processing that is necessary or obligatory in any way).

## **7. How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. When assessing what retention period is appropriate for your personal data, we take into consideration:

- the requirements of our business and the services provided;
- any statutory or legal obligations;
- the purposes for which we originally collected the personal data;
- the lawful grounds on which we based our processing;
- the types of personal data we have collected;
- the amount and categories of your personal data; and
- whether the purpose of the processing could reasonably be fulfilled by other means.

## **8. How and Where Do You Store or Transfer My Personal Data?**

We will normally only store or transfer your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

However, in some cases, mainly for legacy systems, and where authorized by you, we may store data in countries outside the EEA which is covered by the two clauses below:

- We use specific contracts with external third parties that are approved by the European Commission for the transfer of personal data to third countries. These contracts ensure the same levels of personal data protection that would apply under the GDPR. More information is available from the [European Commission](#).]
- Where we transfer your data to a third party based in the US, this may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar levels of data protection to those in Europe. More information is available from the [European Commission](#).

Please contact us using the details below in Part 13 for further information about the particular data protection mechanism used by us when transferring your personal data to a third country.

## 9. **Data Security**

We have put in place commercially reasonable and 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.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## 10. **Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes with the following exceptions.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may sometimes contract with the third parties to supply products and/or services to you on our behalf. These may include payment processing, delivery, warranties cloud services and marketing. In some cases, those third parties may require access to some or all of your personal data that we hold.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 8.

## 11. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests, changes or deletion requests should be made in writing and sent to the email or postal addresses shown in Part 13.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request in not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 12. **Right To Withdraw Consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to direct marketing that you have indicated you would like to receive from us), you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please email [privacy@ayooda.co.uk](mailto:privacy@ayooda.co.uk)

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## 13. **Contact Us?**

If you have any questions regarding this notice or if you would like to speak to us about the manner in which we process your personal data, please email our *Data Protection Officer* Mr J. Wu us at [privacy@ayooda.co.uk](mailto:privacy@ayooda.co.uk) or phone 02088196296..

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time. The ICO's contact details are as follows:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Telephone - 0303 123 1113 (local rate) or 01625 545 745

Website - <https://ico.org.uk/concerns>

## 14. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available by email to you.