
WEBSITE PRIVACY POLICY

BACKGROUND:

Jane Systems 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 everyone who visits this Website, <https://www.jane-systems.co.uk/> ("Our Site") 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.

Please read this Privacy Policy carefully and ensure that you understand it.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

"Account"	means an account required to access and/or use certain areas and features of Our Site;
"Cookie"	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 14, below; and
"Cookie Law"	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

2. Information About Us

Jane IT Systems Ltd. is a Limited company registered in England under company number 04045743. Our VAT number is 762884000

We are registered at and operate from the postal address provided below.

We have developed systems that are used to manage organisations Human Resources and Payroll data and may act as Data Processors for those organisations using our solutions.

Our staff and partners are contractually bound by obligations of confidentiality and trained in the protection of personal data. We comply with the Legislation and use the appropriate technical and organisational measures necessary to safeguard your personal data

Where communication with Jane IT Systems is required then you can use the following contact information:

The Jane IT Systems Ltd Data Protection Officer is: Tracey Jane.

info@jane-systems.co.uk

Telephone number: 01792 522 244.

Postal address: Jane IT Systems Ltd Unit 15 Tawe Business Village, Swansea Enterprise Park, Swansea, SA7 9LA

3. What Does This Policy Cover?

This privacy policy aims to give you information on how Jane IT Systems Ltd collects and processes your personal data through your use of our website and other means including post, telephone and email, including any data you may provide through our website when you submit a contact, request or registration form, participate in discussion boards, our newsletters, or other social media functions, or take part in research or a competition

4. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") 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.

5. What Are My Rights?

Under the Data Protection Legislation, 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 Policy 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 2.**
- b) **The right to access the personal data We hold about you. Part 13 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 2 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 hold. Please contact us using the details in Part 2 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 withdraw consent. This means that, if We are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.**
- h) **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.**
- i) **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 2.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data We hold about you changes, please keep [us] OR [me] informed as long as We have that data.

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. We would Welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 2.

6. What Data Do You Collect and How?

We obtain information about you when you use our website, for example, when you contact us about roles or make enquiries about our services, if you register to attend a demonstration, webinar or receive one of our newsletters.

This includes information provided at the time of registering to use our website, subscribing to any service we provide or requesting further services. For example, we may collect, use, store and transfer personal data about you as follows:

- **Identity Data** such as first name, last name, username or similar identifier.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also ask you for information if you enter a competition or promotion sponsored by us, and if you report a problem with our website.

We also collect Information you provide to us by other means (including, for example, by telephone or email)

If you contact us, we may keep a record of that correspondence.

7. What is the Lawful Basis for Using My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The lawful basis for using your personal data will be the Legitimate Interests of performing the task and activities for which you provided your information.

8. How Do You Use My Personal Data?

We may use your information to:

- **Respond to an enquiry you have made**
- **Administer your participation in a product demonstration or Webinar**
- **Deliver white papers, tips and advice relating to our products and services**
- **Carry out our obligations arising from any contracts between you and us.**
- **To ensure that content from our website is presented in the most effective manner for you and for your computer**

- To keep you informed about changes to our services

Clients using our products and services should view our Privacy Notice which advises of the protection and use of data as applied to the products and services we deliver.

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 ,telephone or text message with information, news, and offers on our products and 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 Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We will only use your personal data for the purpose(s) for which it was originally collected unless We reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If We do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 2.

If We need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, We will inform you and explain the legal basis which allows us me to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

9. 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. Your personal data will therefore be kept for 48 months following the date you submitted your data to our website.

Where you enter into a contract with us and /or any financial transactions are made we will retain contract and transaction records for 6 years following termination or completion.

10. How and Where Do You Store or Transfer My Personal Data?

We employ Capsule CRM software to store your information. Capsule is hosted on Amazon Web Services (AWS) Cloud infrastructure, for more information please visit <https://aws.amazon.com/compliance/gdpr-center/> and <https://capsulecrm.com/security/>.

When any financial transaction is administered, we use a financial management system called Xero for invoicing, please visit

<https://www.xero.com/uk/campaigns/xero-and-gdpr/>.

Where your data is held outside the systems outlined above, we will only store or transfer your personal data within the European Economic Area (the “EEA”). This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law.

The security of your personal data is essential to us, and to protect your data, We take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality.

Our Data Breach Policy defines procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying Data Controllers, Data Subjects and/or the Information Commissioner’s Office where We are legally required to do so;

11. Do You Share My Personal Data?

We will not sell or rent your information to third parties

We may transfer your personal information to a third party as part of our contractual obligations, however, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

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.

12. How Can I Control My Personal Data?

In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Site, you may be given options to restrict our use of your personal data. In particular, We aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails or at the point of providing your details.

You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

13. Can I Withhold Information?

You may access certain areas of Our Site without providing any personal data at all.

However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Part 15.

14. 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 should be made in writing and sent to the email or postal addresses shown in Part 2.

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 within 1 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.

15. How Do You Use Cookies?

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

By using Our Site, you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by Websites, services, and/or parties other than us. Third-party Cookies are used on Our Site for website analytics and tag management, remarketing and behavioural retargeting, online advertising. These Cookies are not integral to the functioning of Our Site and your use and experience of Our Site will not be impaired by refusing consent to them.

All Cookies used by and on Our Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a popup requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended. You will be given the opportunity to allow only first-party Cookies and block third-party Cookies.

Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings, but please be aware that Our Site

may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

16. Changes to this Privacy Policy

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 immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.