



This document contains the current Devel Box Ltd, registered company number 12226235, Groups Privacy Notice. The Group consists of

1. The Devel Box Ltd
2. Web-Zilla
3. Worth It Web
4. Commerce Cart
5. Opti-Might
6. Host Source
7. Creativists

1. INTRODUCTION:

We, The Devel Box Ltd group, take the protection of your personal data very seriously and strictly adhere to the rules laid out by data protection laws and the General Data Protection Regulation (GDPR).

This privacy notice aims to give you information on how we collect and process your personal data through your use of this, and websites that fall under the group, sites and any data you may provide, if you contact us regarding our services or if you participate in the service process (being a client or a prospect).

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the contact information laid out in section 10.

2. LAWFUL BASIS OF PROCESSING PERSONAL INFORMATION

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where:

- The data subject (you) has given consent to the processing activity taking place. This is done through by signing up to one of our services and filling in a Scope of work or questionnaire.
- If the processing is necessary for the performance of a contract. This is when you enter into a service agreement with us.
- If the processing is necessary for the purpose of the legitimate interest pursued by us or our partners. This is when we may process your data from public sources such as LinkedIn.
- Through legal obligations, such as tax and VAT purposes.

3. WHAT INFORMATION DO WE COLLECT AND WHERE FROM?

We collect personal information from you, for example, if you email us, request product information, call us or use any of our services. The categories of personal information we may collect, store, and use about you depends on our relationship with you. However, these could include:

- Name
- Email address

- Address
- Phone Number
- Photos
- Any data that may be included with potential website content (all supplied by you).

4. HOW LONG DO WE KEEP INFORMATION FOR

We pride ourselves on ensuring that your personal data is only retained for the period that we need it for. We will retain your contact information and website files for the duration of our dealings with you plus a 7-year period. This allows us to keep payment information in line with the relevant tax laws and allows us to retain a **backup*** of your information/website should you return to us for the service.

****Please contact us for more information regarding the backup of your site. Backups are not guaranteed, but we will assist where we can.***

5. SECURITY OF PERSONAL INFORMATION

We are committed to handling your personal information with high standards of information security. We use computer safeguards such as strong passwords and anti-virus software. We also ensure only the employees who need access to your data to be able to do their jobs are the ones who have access. Our website and email provider have also been vetted to ensure they uphold the minimum-security standards of their industries.

6. CHILDREN'S INFORMATION

We will only collect child information when it has been provided to us by you, the data subject for content on your website. We, in this situation, would only be acting as the processor and therefore any parental consent requirements would need to be established by you as the Data Controller. If we receive a complaint about the use of child data and the relevant consent cannot be provided by you, the content involving the child will be deleted from our systems and we will not be able to sue the content until it is obtained.

7. YOUR INDIVIDUAL RIGHTS

In this Section, we have summarised the rights that you have under the General Data Protection Regulation. Some of the rights are complex, and not all the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

Your principal rights under General Data Protection Regulation are:

- Right to Access
- Right to Rectification
- Right to Erasure
- Right to Restrict Processing
- Right to Object
- Right to Data Portability
- Right to Contest Automated Decision Making – (The Devel Box Ltd does use automation in this way)

You have the right to confirmation as to whether we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional

information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee (£10) or your request may be rejected if deemed excessive or unreasonable.

You, as a data subject, have the right to rectification which will allow you as the data subject to modify/change any personal information for the purpose of ensuring that the information we process is updated to date.

The right to erasure or right to be forgotten will allow you as the data subject to inform us that you no longer want us to continually store or process your personal information. Please be aware that we may decline your right for several reasons, which are not limited to, having a lawful basis to process your information or us needing your information for the performance of a contractual or legal obligation.

As a data subject you have the right to request the stopping of any processing of your personal information. Please be aware that you must provide us with a legitimate reason for us to stop processing. Any request made that does not conform to GDPR will be rejected.

The right to data portability will allow you as the data subject to have your personal information securely transferred to another organisation for processing. We place this responsibility on you, the data subject. When you make this request, we will export all information about you and securely transfer it to you. You, the data subject will be able to give this information to your chosen organisation.

If you have any question about these rights, please see "additional information", section 10 of this policy.

8. DATA TRANSFERS/THIRD PARTIES

8.1 PROVIDING YOUR INFORMATION TO OTHERS

We do not sell your data to any other providers. The only providers we may share your data with are those required to be able to offer you our services. These include but are not limited to:

Our webhosting and email provider (LCN.com (<https://www.lcn.com/>))

Our customer tracking tool, Pipe Drive (<https://www.pipedrive.com/>)

Our Payment Providers, PayPal (<https://www.paypal.com/>)

For more details on the providers we use, please contact us with the information in section 10 of this notice.

8.2 INFORMATION SECURITY WITH TRANSFERS

In this section, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).

We may share personal information to third parties outside of the European Economic Area (EEA), for example our customer tracking tool may need to host our services outside of the EEA. If this were to change, we would ensure that information security at the highest standard would be used to protect any personal information. This would include the use of encryption on transit and ensuring that data protection laws are being pursued.

9. RIGHT TO COMPLAINT

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading, or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact us via email at dpo@thedevelbox.co.uk

Alternatively, you can make a complaint to the Information Commissioner's Office:

By Post:

Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

By Website:

ico.org.uk/global/contact-us/

By Phone:

0303 123 1113 (Local rate) or 01625 545 745 (National rate)

10. ADDITIONAL INFORMATION

Your trust is important to us. That is why we are always available to talk with you at any time and answer any questions concerning how your data is processed. If you have any questions that could not be answered by this privacy notice or if you wish to receive more in-depth information about any topic within it, please contact us at dpo@thedevelbox.co.uk

11. REVIEW OF THIS POLICY

We keep this Policy under regular review. This Policy was last updated on 23/05/2020

12. AMENDMENTS

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.