

PRIVACY POLICY



1. Purpose Of This Privacy Policy

StarTraq Ltd 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-UK).

This privacy notice gives you information on how we collect and process your personal data through your use of this site and any data you may provide if you contact us regarding our products and services.

We have appointed a data protection officer (DPO) who is responsible for monitoring and providing guidance with our GDPR status. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the contact information in section 18 of this privacy notice.

2. Why We Collect Your Personal Information

We collect your personal data for one of the following purposes:

- To enable services detailed in the contract with you to be delivered
- Business management and planning activities
- Liaising with selected third parties on your behalf
- Making arrangements for the termination of our working relationship
- Direct marketing related to relevant products and services

3. Lawful Basis Of Processing 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
- If the processing is necessary for the performance of a contract
- The processing is necessary to protect someone's life (vital interests)
- If the processing is necessary for compliance with a legal obligation to which the controller is subject
- If the processing is necessary for the purpose of the legitimate interest pursued by us or our partners
- If processing is necessary for the performance of a task carried out in the public interest

Where legitimate interest is identified as a lawful basis, we will undertake a legitimate interest assessment which is a three-part test covering:

- **The Purpose test** – to identify the legitimate interest
- **The Necessity test** – to consider if the processing is necessary for the purpose identified
- **The Balancing test** – considering the individual's interests, rights or freedoms and whether these override the legitimate interests identified

The legitimate interests of our processing include marketing campaigns via email, brochures at trade shows and customer referencing.

4. What Information We Collect And Where From

We collect personal information from you, for example, if you request product information, call us or use any of our services. Generally, information would be collected soon after signing a contract to provide services or through marketing channels where there is a legitimate interest or consent has been given. Data is then kept up to date at certain intervals.

We would contact a client soon after signing a new contract to provide services and rarely later in the business relationship. Personal data would thereafter be collected directly and specifically required to fulfil our obligations under the contract.

The categories of personal information that we may collect, store and use about you include:

- Name
- Address
- Telephone Number
- Email Address
- Company Name

We use our Customer Relationship Management system to deliver our email campaigns. Using industry-standard technologies to help us monitor and improve our email campaigns, we gather statistics around email openings and clicks.

We also collate information volunteered by potential customers via our website via the online demo request form. This is not shared with a third party.

5. Special Category Data

We will only process special category data where we have an Article 9 exception allowing us to do so (in addition to a lawful basis under Article 6), in this case,

- Explicit consent from the data subject
- To carry out specific obligations and rights in the field of employment and social protection law
- To protect the vital interests of an individual who is incapable of giving consent
- Not-for-profit bodies
- The personal data has been manifestly made public by the data subject
- To support legal claims or courts acting in their judicial capacity
- For reasons of substantial public interest (with a basis in law)
- Health or social care (with a basis in law)
- For reasons of public interest regarding public health (with a basis in law)
- Archiving research and statistics (with a basis in law)

6. Third Party Collection Of Personal Data

We also collect personal information for direct marketing purposes. This information is sourced from various sources, including purchasing distribution lists, directly via customer orders, social media, website enquiries, trade shows and conferences.

7. How Long We Keep Information For

We pride ourselves on ensuring that your personal data is only retained for the period that we need it for, or in accordance with laws, regulations and professional obligations that we are subject to. All personal information collected has a defined retention period, which is in-line with our retention policy. If you would like to find out how long your information is being retained, please see "additional information", section 18 of this policy.

8. Security Of Personal Information

We take the responsibility for protecting your privacy very seriously and we will ensure your data is secured in accordance with our obligations under the Data Protection laws. We have in place technical and organisational measures to ensure personal information is secured and to prevent your personal data from being accessed in an unauthorised way, altered or disclosed. We have in place a robust access control policy which limits access to your personal data to those employees and other third parties who only have a business need to know. The processing of your personal data will only take place subject to our instruction.

We have policies and procedures to handle any potential data security breaches and data subjects, third parties and any applicable regulators will be notified where we are legally required to do so.

We have ensured that all employees have had information security and data protection training. If you would like more details of the security we have in place, please see "additional information", section 18 of this policy.

9. Children's Information

We do not knowingly collect information on children. If we have collected personal information on a child, please contact us immediately using the details in section 18, so we can remove this information without any undue delay.

10. Your Individual Rights

In this section, we have summarised the rights that you have under 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 Object
 - Right of Access
 - Right to be Informed
 - Right to Rectification
 - Right to Erasure
 - Right to Restrict Processing
 - Right to Data Portability
- The Right to Object

You can exercise this right if:

- Processing relies on legitimate interest
 - Processing is for scientific or historical research
 - Processing includes automated decision making and profiling
 - Processing is for direct marketing purposes
- The Right of Access
 - You or any third party acting on your behalf with your authority may request a copy of the personal data we hold about you without charge.
 - We will ask to verify your identity or request evidence from the third party that they are acting on your behalf before releasing any personal data we hold about you.
 - The Right to be Informed
 - We are required, to provide clear and transparent information to you about how we process your personal data. This privacy notice addresses this right.
 - The Right of Rectification
 - If you believe the personal data we hold about you is incorrect or incomplete you have the right to correct this and you may exercise this right along with the right to restrict processing until these corrections are made.
 - The Right to Erasure
 - If there is no legal basis or legitimate reason for processing your personal data, you may request that we erase it.
 - The Right to Restrict Processing

- You may ask us to restrict the processing of your personal data. This means we will still hold it but not process it. This is a conditional right which may only be exercised when:
 - Processing is unlawful
 - We no longer need the personal data, but it is required for a legal process
 - You have exercised your right to object to processing and require processing to be halted while a decision on the request to object is made
 - If you are exercising your right to rectification

- The Right to Data Portability
 - You can request that your personal data is transferred to another controller or processor in a machine-readable format if:
 - Processing is based on consent
 - Processing is by automated means (i.e. not paper based)
 - Processing is necessary for the fulfilment of a contractual obligation

If you have any questions about these rights, please see "additional information", section 18 of this policy.

11. Consent

Where you have given consent for processing, or explicit consent in relation to the processing of special category data, you have the right to withdraw this consent at any time, but this will not affect the lawfulness of processing based on consent before its withdrawal.

12. Failure To Provide Personal Information

Where we need to collect personal data by law or in order to process your instructions or perform a contract we have with you and you fail to provide that data when requested, we may not be able to carry out your instructions or perform the contract we have or are trying to enter into with you. In this case, we may have to cancel our engagement or contract you have with us, but we will notify you if this is the case at the time.

13. Cookies

Our website uses cookies. Please see our cookies policy for full details of the cookies used.

14. Automated Decision Making

Your personal data is not used in any automated decision making (a decision made solely by automated means without any human involvement) or profiling (automated processing of personal data to evaluate certain conditions about an individual).

Where we make an automated decision which has a legal or substantially similar effect, you have the right to speak to us and we may then review the decision, provide a more detailed explanation and assess if the automated decision was made correctly.

15. Transfers To Third Parties

StarTraq Ltd, may disclose your personal data, listed in section 4 to some third parties to help us deliver our services/products. All third parties are contractually bound to protect the personal data we provide to them. We may use several or all of the following categories of recipients:

- Business partners, suppliers, contractors for the performance of any contract we enter into with them or you
- Companies within our group where necessary for administrative purposes and to provide services to you
- Third parties that support us to provide products and services e.g. IT support, cloud-based software services, providers of telecommunications equipment
- Payment service providers
- Recruitment service providers
- Professional advisors e.g. lawyers, auditors
- Web analytics and search engine providers, to ensure the continued improvement and optimisation of our website

16. Transfers Outside Of The UK

In this section, we provide information about the circumstances in which your personal data may be transferred and stored in countries outside the UK.

We may share personal information to third parties outside of the UK. Any personal information transferred will only be processed on our instruction and we ensure that information security at the highest standard would be used to protect any personal information as required by the Data Protection laws.

Where personal data is transferred outside of the UK to a country without an adequacy decision, we will ensure appropriate safeguards are in place prior to the transfer. These could include:

- International Data Transfer Agreement
- An exception as defined in Article 49 of the UK GDPR

For more information about transfers and safeguarding measures, please contact us using the information in section 18.

17. 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 info@startraq.com

Alternatively, you can contact us:

By Post:

Data Protection Lead
StarTraq Limited
StarTraq House
Banbury Office Village
Noral Way
Banbury
OXON
OX16 2SB

By Phone: 01295 273000

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: [Click Here](#)

By Email: [Click Here](#)

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

18. Additional Information

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

Our Data Protection Officer is Bulletproof who can be contacted on dposupport@bulletproof.co.uk.

19. Policy Review and Amendments

We keep this Policy under regular review. This Policy was last updated on 21/12/2023.

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 information.