

# PRIVACY POLICY

Welcome to the privacy policy of *J.B Cole Limited* trading for its purposes as technology tune up (the “Company”). As a company we respect your privacy and are committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website and tell you about your privacy rights and how the law protects you.

By using <http://www.technologytuneup.co.uk/> (the “site”) you signify your agreement to the terms and conditions as well as the privacy policies described herein.

If you do not agree with our privacy policies, please refrain from using our site or making a purchase. If we make any substantial changes in the way we use your personal information we will notify you by posting a prominent announcement on our pages or we will email you at our discretion.

## IMPORTANT INFORMATION AND WHO WE ARE

### PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information on how the Company collects and processes your personal data through your use of this website, including any data you may provide through this website when you purchase a product or service.

This privacy policy supplements other notices and policies and is not intended to override them.

### CONTROLLER

*J.B Cole Limited* is the controller and responsible for your personal data, collectively referred to as, “the Company”, “we”, “us” or “our” in this privacy policy. We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

### CONTACT DETAILS

If you have any questions about this privacy policy, please contact us in the following ways:

- **Full name of legal entity:** *J.B Cole Limited*
- **Trading Name:** Technology Tune Up
- **Email address:** [info@jbcoble.co.uk](mailto:info@jbcoble.co.uk)
- **Postal address:** John Swift Building, 19, Mason Street, Manchester, England, M4 5FT

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review. This version was last updated on **04/09/2018**. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you.

When you leave our website, we encourage you to read the privacy policy of every website you visit.

## THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth
- **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.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any **Special Categories of Personal Data** about you (*this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data*). Nor do we collect any information about criminal convictions and offences.

## IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (*for example, to provide you with goods or services*). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you: apply for our products or services; create an account on our website; subscribe to our service or publications; request marketing to be sent to you; give us feedback or contact us. If the information you provide cannot be verified, we may ask you to send us additional information, such as your driver's licence, credit card statement, or a recent utility bill or other information confirming your address, or to answer additional questions online to help verify your information

## COOKIES AND SIMILAR TECHNOLOGIES

A cookie is a small text file which is placed onto your device (*eg computer, smartphone or other electronic device*) when you use our website. We use cookies on our website.

These help us recognise you and your device and store some information about your preferences or past actions.

For further information on our use of cookies, please see our Cookie Policy

## HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the obligations for you as a user of our service.
- Where it is necessary for our legitimate interests (*or those of a third party*) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

## INFORMATION WE PROCESS BECAUSE WE HAVE A CONTRACTUAL OBLIGATION WITH YOU

When you interact with our service, certain obligations are created between *Technology Tune Up* and yourself. In order to carry out our obligations we must process the information you give us. Some of this information may be personal information.

*We may use it in order to:*

- provide you with our services
- provide you with suggestions and advice on the services we provide
- We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

## INFORMATION WE PROCESS WITH YOUR CONSENT

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful. We continue to process your information on this basis until you withdraw your consent, or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us at the following email address: [info@jbcole.co.uk](mailto:info@jbcole.co.uk). However, if you do so, you may not be able to use our website or our services further.

## **INFORMATION WE PROCESS FOR THE PURPOSES OF LEGITIMATE INTERESTS**

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

*For example, we may process your data on this basis for the purposes of:*

- record-keeping for the proper and necessary administration of our business
- responding to unsolicited communication from you to which we believe you would expect a response
- protecting and asserting the legal rights of any party
- protecting your interests where we believe we have a duty to do so

## **INFORMATION WE PROCESS BECAUSE WE HAVE A LEGAL OBLIGATION**

Sometimes, we must process your information in order to comply with a statutory obligation. For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order. This may include your personal information.

## **OPTING OUT**

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

## **CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

## **DISCLOSURE AND SHARING OF YOUR INFORMATION**

There are a limited number of situations where we may disclose your personal information to others without first receiving your consent:

- when we believe release is appropriate to comply with the law,
- if you violate or breach an agreement with us,

- if we believe conduct by you will harm the property or rights of the Site or those of our customers,
- in connection with the sale of all or substantially all of our company's assets or the sale of an entire web site or business division

In some occasions, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

## **INTERNATIONAL TRANSFERS**

We do not transfer your personal data outside the European Economic Area.

## **DATA SECURITY**

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

## **DATA RETENTION**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for.

In some circumstances you can ask us to delete your data. In some circumstances we will anonymise your personal data (*so that it can no longer be associated with you*) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights include: *Request access to your personal data; Request correction of your personal data; Request erasure of your personal data; Object to processing of your personal data; Request restriction of processing your personal data; Request transfer of your personal data; Right to withdraw consent*

If you wish to exercise any of the rights set out above, please contact us