



Privacy Policy

May 2018

Version 1.0



Privacy Policy

Overview Statement

Whiterock Group Ltd (the Group Company) 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 our websites (“Our Sites”), as detailed in section 2, 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. Your acceptance of this Privacy Policy is deemed to occur upon your first use of Our Sites. If you do not accept and agree with this Privacy Policy, you must stop using Our Sites immediately.

This privacy policy sets out, in line with the General Data Protection Regulation (GDPR) 2018, what we will and will not do with your information.

Policy Details

1. Definitions and Interpretation

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

“Cookie”	means a small text file placed on your computer or device by Our Sites when you visit certain parts of Our Sites and/or when you use certain features of Our Sites. Details of the Cookies used by Our Sites 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

This policy covers the following companies and websites:

Whiterock Group Ltd (SC503867) (Group Company)	- www.whiterockgroup.net
ZynQ 360 Ltd (SC523812)	- www.zynq360.com
Mercury 92 Ltd (SC491029)	- www.mercury92.com
AIMS Global Consulting Ltd (SC504137)	- www.aimsglobalconsulting.com

Our Sites are owned and operated by Whiterock Group Limited, a Limited Company registered in Scotland under company number SC503867.

Registered address: Leadside House, 62 Leadside Road, Aberdeen, AB25 1TW
VAT number: GB263834880

Data Controller: Aly Gray
Email address: alygray@zynq360.com
Telephone number: +44 (0) 1224 582430

3. What Does This Policy Cover?

This Privacy Policy applies to your use of Our Sites. Our Sites may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

This policy also covers the collection of personal information supplied by you verbally or via email, business card or any other method where supplied by you.

4. 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.

5. What Are My Rights?

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

- ⊕ 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 15.
- ⊕ The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- ⊕ 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 15 to find out more.
- ⊕ 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 15 to find out more.
- ⊕ The right to restrict (i.e. prevent) the processing of your personal data.
- ⊕ The right to object to us using your personal data for a particular purpose or purposes.
- ⊕ 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.
- ⊕ 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 15.

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.

6. What Data Do We Collect?

Website

The website uses a cookie for Google Analytics. It does not capture or store personal information, but merely logs the user's IP address which is automatically recognised by the web server. This is used to record the number of visitors to our sites and volumes of usage.

For more information about Google Analytics visit the Google Analytics website.

If you do not wish to accept cookies on to your machine you can disable them by adjusting the settings on your browser. (please also see Part 14 on Our use of Cookies and similar technologies).

Clients / Suppliers

If you request or use our services, we will usually collect the following data:

- ⊗ Your name
- ⊗ Your contact details (email, phone and address)
- ⊗ Your bank account details (suppliers)

7. 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
- ⊗ Providing and managing your access to Our Sites
- ⊗ Personalising and tailoring your experience on Our Sites
- ⊗ Supplying Our products and 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 services for you.
- ⊗ Communicating with you. This may include responding to emails or calls from you.
- ⊗ Supplying you with information by email and post that you have opted-in to (you may unsubscribe or opt-out at any time by emailing info@zynq360.com or contacting the Data Controller detailed in Part 2).
- ⊗ Analysing your use of Our Sites and gathering feedback to enable us to continually improve Our Sites and your user 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 and news, and 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.

8. 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. From time to time we may ask you to update your details or re-subscribe to our contact list. If you choose to unsubscribe from our mailing list, we may keep a 'suppression list' which includes your details so that we know you have chosen to be removed from the list.

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

We ensure that there are appropriate technical security controls in place to protect your personal details; for example, our network is protected and routinely monitored.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff and contractors.

We sometimes use external companies and software packages, such as email service providers, accountancy systems and databases, to store or process personal data. These are companies who adhere to privacy regulations and each has data processing agreements in place that sets out how they handle your data.

We'd like to reassure you that we have not and will not retain your information in an unauthorised way nor share, sell or pass on your details to any other 3rd party for the purposes of marketing. We will only ever share your data in other circumstances if we have your explicit and informed consent.

We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the "EEA" consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as "third countries" and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional 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 follows.

We share your data within the group of companies of which we are a part. Where this involves the transfer of personal data outside the EEA, Our group ensures that personal data is protected by requiring all companies within the group to follow the same rules with respect to personal data usage. These are known as "binding corporate rules". More information on binding corporate rules is available from the European Commission.

10. Do You Share My Personal Data?

We may share your personal data with other companies in Our group for communicating and managing the services we provide you and for marketing other services that we genuinely feel would be of interest to you. These group companies are:

- ⊗ Whiterock Group Ltd (parent company)
- ⊗ ZynQ 360 Ltd
- ⊗ Mercury 92 Ltd
- ⊗ AIMS Global Consulting Ltd

We may sometimes contract with third parties to supply certain products and services. These may include production, payment processing, delivery, 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 9.]

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 9.]

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.

11. How Can I Control My Personal Data?

- 🕒 In addition to your rights under the GDPR, set out in Part 5, when you submit personal data via Our Sites, 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.

12. Can I Withhold Information?

You may access Our Sites without providing any personal data at all.

You may restrict Our use of Cookies.

13. 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 15 along with proof of your identity.

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 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.

14. How Do You Use Cookies?

Our Sites 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 Sites and to provide and improve Our products AND/OR services. In addition, Our Sites uses analytics services provided by Google Analytics, which also use Cookies. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling us to better understand how people use Our Sites.

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15. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Aly Gray / Data Controller):

- ④ Email address: alygray@zynq360.com
- ④ Telephone number: +44 (0) 1224 582430
- ④ Postal Address: Leaside House, 62 Leaside Road, Aberdeen, AB25 1TW

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

This policy was last updated May 2018 (version 1.0)