



SHIFTEC

Website Privacy Policy

Shiftec (Leamington) Limited and Shiftec (Willenhall) Limited, respects your privacy and is 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 (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Purpose of this Privacy Policy

This privacy policy aims to give you information on how Shiftec (Leamington) Limited and Shiftec (Willenhall) Limited collects and processes your personal data through your use of this website, including any data you may provide through this website.

We ask that you read this website privacy policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

This website privacy policy is divided into the following sections:

1. Who we are
2. Our website
3. Our collection and use of your personal information
4. Cookies
5. Marketing
6. Your rights
7. Keeping your personal information secure
8. How to complain
9. Changes to this website privacy policy
10. How to contact us
11. Do you need extra help?

1. Who we are

This website is operated by Shiftec (Leamington) Limited and Shiftec (Willenhall) Limited.

We collect, use and are responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union and the United Kingdom and we are responsible as 'controller' of that personal information for the purposes of those laws.

2. Our website

This privacy policy relates to your use of our website www.shiftec.com. 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. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

3. Our collection and use of your personal information

We collect this personal information from you either directly, such as when you access our website, register with us, contact us, post material to our website or indirectly, such as your browsing activity while on our website (see 'Cookies' below).

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:



SHIFTEC.COM

Shiftec, Global Technology Centre, Brake House, Juno Drive, Leamington Spa CV31 3RG

Registered Address: Shiftec (Leamington) Ltd, 40 Grosvenor Place, London SW1X 7GG, United Kingdom. Registered in England No. 099077669.

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- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- 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.
- 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 also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

This website is not intended for children and we do not knowingly collect data relating to children.

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.

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 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 contract we are about to enter into or have entered into with you.
- 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.

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 and/or purchase our products or services;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. We use cookies for two reasons:

- to help us track usage patterns in order to improve and manage our sites
- to record preferences in order to personalise your visit

Purposes for which we will use your personal data

For further details on when we collect personal information, what we collect as well as how we use it, please read the following sections:

When information is collected	What information we ask for	How and why we use your information
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to develop our products/services and grow our business)

4. Cookies

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. These help us recognise you and your device and store some information about your preferences or past actions. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

The types of cookies used on this website are:

Session Cookies

These are temporary cookies that only remain until your browser is closed. They are used by our web application in order to maintain the information relating to your transaction from page to page following any input, such as when a form is completed over several screens.

Web Analytics Cookies

These cookies are used to help us compile anonymous statistics in order to improve and manage our sites. An example of the information collected would be the path you used to gain access to the site and your patterns of browsing when navigating the site. Unclassified Cookies Unclassified cookies are cookies that we are in the process of classifying, together with the providers of individual cookies.

Necessary Cookies

Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

5. Marketing

We would like to send you information about Shifttec, which may be of interest to you. You will receive marketing communications from us if you have requested information from us and you have not opted out of receiving that marketing. If you have previously agreed to being contacted in this way, you can unsubscribe at any time by using the 'unsubscribe' link in emails from us.

For more information on your rights in relation to marketing, see 'Your rights' below.

6. Your rights

Under the [General Data Protection Regulation](#), you have a number of important rights free of charge. In summary, those include rights to:

- fair processing of information and transparency over how we use your personal information
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email us at DPO@shifttec.com
- let us have enough information to identify you such as Full Name, User Name, Address, Email Address and Date of Birth
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates including any account or reference numbers, if you have them

7. Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

8. How to complain

We hope that we can resolve any query or concern you raise about our use of your information.

The [General Data Protection Regulation](#) also gives you the right to lodge a complaint with a supervisory authority, in particular in a European Economic Area state or in the United Kingdom if you work, normally live or if any alleged infringement of data protection laws occurred in the relevant state. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone 0303 123 1113.

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

9. Changes to this website privacy policy

This website privacy policy was published on 1st July 2018 and last updated on 16th October 2020.

10. How to contact us

Please contact us at DPO@shiftec.com if you have any questions about this privacy notice or the information we hold about you. Alternatively you can write to us at Shiftec (Leamington), Brake House, Juno Drive, Leamington CV31 3RG.

11. Do you need extra help?

If you would like this website privacy policy in another format (for example: audio, large print, braille) please contact us (see 'How to contact us' above).