

# Privacy Notice

## For ADISA and ADISA Research Centre

We at Asset Disposal and Information Security Alliance Limited, also known as ADISA and the ADISA Research Centre (ARC) are registered with the chosen Local Supervisory Body, the UK's Information Commissioner's Office, as a Data Controller registration number ZA239175.

We are specialist in Data Protection services including service and product certification and operate from two offices located in Harpenden UK and Cowbridge UK.

## Your Privacy

Your privacy matters to us and we are committed to the highest data privacy standards and data subject confidentiality. To disclose this to you, our Privacy Notice includes the following:

- What data we collect from you.
- How and why we process it.
- Who we share it with and why?

We adopt the six core principles of data protection which are:

1. **Lawfulness, fairness and transparency** - we process personal data lawfully, fairly and in a transparent manner in relation to you, the data subject.
2. **Purpose limitation** - we only collect personal data for a specific, explicit and legitimate purpose. We clearly state what this purpose is in this Privacy Notice, and we only collect data for as long as necessary to complete that purpose.
3. **Data minimisation** - we ensure that personal data we process is adequate, relevant and limited to what is necessary in relation to the processing purpose.
4. **Accuracy** - we take every reasonable step to update or remove data that is inaccurate or incomplete. You have the right to request that we erase or rectify erroneous data that relates to you, and we will complete this task as soon as possible but guarantee to do so within a month.
5. **Storage limitation** - we delete personal data when we no longer need it. Whilst the timescales in most cases aren't set, we outline our retention strategy within this Privacy Notice.
6. **Integrity and confidentiality** - we keep personal data safe and protected against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

# Collection of your Personal Data

We collect your personal information via disclosure directly from you. This might be via our website, telephone or face to face engagement.

We collect data automatically from our websites, which includes your IP address and your browsing behaviour. This allows us to provide a more performant website to you.

## **Categories and Type of Personal Data Collected and processed.**

We collect contact details from you including:

- Name
- Business Address
- Business Telephone number(s)
- Business email addresses

We treat all personal data as sensitive and process some special categories of data as part of our audit process. This is not retained nor stored by us and it only viewed at ADISA member location.

## **Child Data**

We do not process data which until Article 8 of the GDPR and Article 9 of the UK Data Protection Act 2018 would be classed as relating to children under 16 (For the UK this is under 13).

## **Reason for Data collection and processing activities.**

We use information held about you in the following ways:

- To provide you with information, products or services that you request from us or which we feel may legitimately interest you. You can choose to opt-out of contact at any time.
- To carry out our obligations arising from any contracts entered into between you and ourselves.
- To notify you about changes to our service(s).
- To ensure that content from our site is presented in the most effective manner for you and for your computer.

We compile aggregate statistics about how our website is used, its performance and any other related site information, but will never identify any individual in the process.

## **Sharing of Personal Data**

During the delivery of our service to you, we will share your data with other companies who are critical for the provision of our service to you and will be viewed as Data Processors. They are under contract with us and have provided sufficient guarantees that they will process your data only as per the terms of that contract and throughout processing activities will ensure your data is protected using appropriate technical and organisation measures.

A full list of processors is available from our Data Protection Officer but includes service providers such as Sales Force, Jlex Networks and Microsoft.

We do not share your data with any data processors which are not part of our own service delivery mechanism.

## **Securing and Processing of your Personal Data**

We are committed to ensuring that appropriate technical and organisational measures are in place to protect your data.

Technical measures that we implement include:

- User devices are encrypted, ensuring data at rest is encrypted.
- 2 Factor Authentication is enforced wherever possible, for remote VPN access etc
- Centrally managed AV and patch management is implemented on all connected devices containing personal data.
- Updates supplied by software vendors are installed in a timely manner
- All devices containing personal data are securely wiped in a reasonable manner ensuring they contain no data, when disposed of.
- Access reviews are carried out once a month.
- All communications are scanned before and after transit for malware and viruses.

Organisation measures include:

- Personal data, stored by JLex Networks Ltd, is stored in EU datacentres only
- All connections are encrypted.
- All data access is logged.
- We operate a clear desk policy.
- We operate data anonymisation in our file structures.
- Our employees have all signed confidentiality agreements as part of the employment process, all undergo vetting, and all receive data protection training on an annual basis.

In the unlikely event that we lose your data, or a device on which your data resides, or it is accessed by someone unauthorised, we have a duty to inform you immediately. If the loss or unauthorised access of your data has potential to cause you harm, we will also report this to the Information Commissioners Office; who are responsible for regulating data protection legislation in the UK.

<https://ico.org.uk/>

## Our legal basis for processing your personal data?

We are required to identify one of six possible legal grounds for processing. These are:

- consent
- contract
- legitimate interests
- vital interests
- public task
- legal obligation

As all of our processing activities are crucial to the provision of the service which we enter into a contract with you to provide, we process your data based on that contractual relationship and / or under the terms of the Data Processing Agreements signed with each member.

We could also process your data under our legitimate interests as all processing activities are essential for the provision of our service to you.

# Data Retention

Contact information is retained as long as the data subject is a customer of ours. Where the data subject has not used our services recently, and in the absence of a direct data subject request, we hold contact information for a period of 7 years from the last contact.

## Your rights in relation to personal data

Under the GDPR, you have rights to access and control your personal data. These rights include:

- access to personal information
- correction and deletion
- withdrawal of consent (if processing data on condition of consent)
- data portability
- restriction of processing and objection
- lodging a complaint with the Information Commissioner's Office

You can exercise your rights by emailing our Data Protection Officer on [adisadpo@adisa.global](mailto:adisadpo@adisa.global)

If you are unhappy with anything we have done with your data, you have the right to complain to the Information Commissioners Office.

To make a complaint to the Information Commissioners Office use the link below or call their hotline on Tel No.: 0303 123 1113.

<https://ico.org.uk/concerns/>

## Cookies

This website follows the "Implied Consent" basis for processing cookies, in accordance with the General Data Protection Regulation (GDPR), the United Kingdom's Privacy and Electronic Communications Regulations (PECR) and Information Commissioner's Office guidance. The first time you visit this website you will be informed of the cookies we use and that by continuing to browse this website you are implying your consent for us to use cookies.

A cookie is a very small text file placed on your computer. Cookies help us to:

- Understand browsing habits on our website
- Understand the number of visitors to our website and the pages visited
- Remember you when you return to our website so we can provide you with a more personalised experience.

Most cookies are deleted as soon as you close your browser, these are known as session cookies. Others, known as persistent cookies, are stored on your computer either until you delete them, or they expire.

You can choose to block or delete cookies through your browser settings at any time.

# Tracking

This website utilises the following tracking technology:

Site Analytics:

- GA Audiences (Google)
- Google Analytics

If you wish this website to cease tracking but you would still like to use the site, you can find out how to enable “Do Not Track” (DNT) at <https://allaboutdnt.com/>.

## How to contact us?

The website domains listed below are owned and operated by ADISA.

We are registered in England and Wales under registration number 07390092.

For all data protection matters or questions relating to how we manage your data, you can contact our Data Protection Officer via these means:

Data Protection Officer:	ADISA DPO
Phone Number	0845 557 7726
Email:	adisadpo@adisa.global