

Internet@TSP – Privacy Policy

Revised 29 May 2018

1. Data Controller

The Data Controller is John Graham Fleming trading as Internet@TSP, 124 Corve Street, Ludlow, Shropshire, SY8 2PG, UK, who is registered with the Information Commissioner's Office under registration reference ZA335906. Telephone and email details are at the end of this document.

2. Obtaining your personal data

We may collect personal data from you in the following circumstances:

2.1. When you purchase or request goods or services from us, we will require this information in order that we can supply you with the goods or services requested. At this time, we may also ask you whether you wish to be included on our mailing list so that we can send you newsletters or information from time to time about other services or goods that we can provide. You do not have to agree to this, and you can unsubscribe from the mailing list at any time.

2.2. If you ask us for a quote or estimate for us to supply you with goods or services, or if you ask us to supply you with information about the services which we offer or the goods that we may supply, we may require this information in order that we can supply you with a quote or estimate. We may ask you, when you ask us for a quote, estimate or information, whether you wish to be included on our mailing list so that we can send you newsletters or information from time to time about other services or goods that we can provide. You do not have to agree to this, and you can unsubscribe from the mailing list at any time.

2.3. If you ask us to register or renew a domain name on your behalf, we will require this information in order to register or renew the domain name with the organisation that registers the domain name (the 'top-level registrar'), and, in most cases, with an intermediary supplier who acts on our behalf.

2.4. If you report a problem with our services or goods, we may need personal information in order to investigate and/or rectify the problem.

2.5. If you apply for a job with us, we will require this information in order to deal with your application.

2.6. If we ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

2.7. When you visit our website www.internet-tsp.co.uk, details of your visit may be collected including, but not limited to, traffic data, your IP address, weblogs and other communication data, whether this is required for our own billing purposes, security purposes or otherwise. We will also keep details of any transactions you carry out through our website and of the fulfillment and administration of your orders.

2.8. If we host your website, you should be aware that there may be personal data that you have included in the website, and we have no control over this inclusion, and cannot be held responsible for this. You are the publisher of your website.

2.9. If we supply you with printed products, the content of this printed matter is assumed to be in the public domain unless to tell us otherwise. Therefore we cannot be held responsible if your personal data (or that of third parties) is included in the printed matter. If you require special treatment of the data in any products that we arrange to have printed for you, you must tell us in advance, and there may be additional charges involved.

2.10. If you have asked us to include details of your business or other organisation on the Ludlow Website™ (www.ludlow.org.uk), your data will be needed so that we can arrange for the details you have requested to be published on that website, and so that we can invoice you for the financial transactions involved with this.

2.10. If you contact us by letter or email, records of the correspondence may be kept.

2.11. We may make notes of telephone conversations and text (SMS) messages.

3. What data do we collect about you?

3.1. We may collect the following kinds of personal data: your name, address, telephone numbers, email address, IP address, business name, website address, type and nature of business.

3.2. We may also collect information about your computer, your operating system and the type of browser used, for system administration and statistical purposes. This information is collected automatically when you visit our website, but when it is collected automatically it is anonymous – it does not identify you as a person.

3.3. Cookies: We may obtain information about your visit to our website by placing a cookie (a small data file) on the hard drive (or equivalent) of your computer or other device. This is a *strictly necessary* cookie to ensure correct operation of parts of the website. It does not identify you. Full information about cookies, and specific information about the cookies that we use, can be found in the Cookies page of our website at www.internet-tsp.co.uk/support/cookies.html . This page also explains how you can disable cookies in you web browser, although if you disable cookies on our website, certain pages may not work correctly.

3.3. We *do not* collect sensitive personal data, and we *do not* store credit card or debit card details. We *do not* knowingly request or collect information about anyone under the age of 18. We *do not* ask for any data that is not necessary for us to hold in the course our business dealings with you.

4. How do we collect this data about you?

We collect this information for the reasons stated above, by asking you verbally or by means of a form or an email, when you make an order or enquiry. In some cases we may collect the information from your website. No information that we hold about you has been obtained from third parties, and we have never bought (or been given) customer or mailing lists from anyone.

5. Where do we store your personal data?

The personal data that we have collected will be stored on our servers in the United Kingdom. Backups may be made regularly for security purposes, and these backups are encrypted and stored on a remote server within the European Economic Area ('EEA'). Paper records (such as invoices, order forms, etc) are stored securely in our offices in the United Kingdom.

6. With whom do we share your personal data?

6.1. We do not and will not sell or give away your personal data to anybody for sales or marketing purposes, and have never done so.

6.2. We need to provide relevant information to third parties such as couriers so that they can deliver your work, contact you to keep you informed of progress of your delivery and so that they can communicate with you in the event of a delivery problem.

6.3. If you ask us to register or renew a domain name on your behalf, we have to pass on some of your personal data to a registration agent, a company that registers or renews domain names on a trade basis for us. We use several companies for this purpose and they are all based within the United Kingdom. These companies are *Data Processors*, and they, in turn, transfer your data in order to register or renew your domain name with the top-level registrar, such as Nominet in the case of .uk domains. The top-level registrars are also *Data Processors*. Throughout this process, your data is transmitted securely and stored in secure conditions on servers that may be outside the European Economic Area.

6.4. When registering or renewing domain names on your behalf, we always register the domain names in the customer's own name, never ours. You should be aware that, through the internet 'WHOIS' system, it is usually possible for the general public to obtain the name and contact details of the owner ('the registrant') of any domain name. In some cases it is possible to hide the identity of the registrant of a domain name, subject to conditions, and we can arrange this for you on request, but there is an additional charge for this service.

6.5. If we provide you with email hosting, the email server through which the emails for that hosting account are sent through and stored on is a secure server located in a secure data centre situated in the United Kingdom. Your emails will of course contain some personal data, such as your name and email address. This email server is operated by a *Data Processor* as part of the service we have arranged with them, as a hosting service provider, to provide. We use several different companies for this purpose, all based in the United Kingdom. In the event of problems with the email service, we may very occasionally need to ask your permission to examine your mailboxes that are on the email server. We will not look at the contents of any messages, and we will never look inside your mailbox without your permission, although if you decline to give us that permission it may mean that it is more difficult or even impossible for us to resolve the problem.

6.6. We may also share your details where there is a contractual, legal or statutory need to do so.

7. Mailing direct to your clients

In the event of your asking us to distribute products or communications by postal mail or email direct to your clients, you are taking responsibility for the possible distribution of personal data. We will require specific written or emailed instructions from you for this, and we will need you to supply the names, addresses and/or email addresses either on a suitably-formatted database or labels. We do not sell, copy or exchange this information and we do not keep your database on file once the items have been despatched.

8. Transfers outside the European Economic Area (EEA)

As explained in paragraph 6.3 above, your data that is needed for domain registration or renewal purposes may be transferred outside the EEA to a *Data Processor* under secure conditions.

9. How long do we keep your data?

9.1. We regularly review the personal data that we hold.

9.2. Where there have been financial transactions between you, the customer, and Internet@TSP, we are required by law to keep this information for a period of seven years.

9.3. If you have asked us for a quote, estimate or information about our services, and no business transaction has resulted from us giving you this information, we will delete your details after approximately six months, unless you have given your consent to be put on our mailing list for news and marketing information.

9.4. If you have asked us to be on our mailing list for news and marketing information, we will ask you to confirm at yearly intervals that you still wish to receive this information. If you decline or do not answer, we will not be able to update you about any new services or offers that may occur.

9.5. Where it appears that there is no on-going business relationship, contractual, legal or statutory obligation, the data is deleted, but before doing this we may ask you whether you wish to receive future newsletters or details of new services or offers. If you decline or do not answer, we will not be able to update you about any new services or offers that may occur.

10. Your data protection rights

10.1. You have the right to update and correct the personal information that we hold about you. In order to do this, please write to us or send us an email (contact details below).

10.2. You have the right at any time to withdraw your consent to us holding your information for marketing purposes. In order to do this, please write to us or send us an email (contact details below).

10.3. Subject Access Request: You have the right to request from us all personal information that we hold that relates to you. We will comply with your request as soon as possible, and in any case within two weeks. In order to do this, please write to us or send us an email (contact details below), specifying how you would like the information to be sent to you. We may need you to provide appropriate identification before we comply. We will not accept subject access requests made by telephone.

10.4. You have the right to request restriction of the processing of the data that we hold about you, and to request that we delete that data or object to continued processing where it is excessive or no longer required for the purpose for which it is collected. In order to do this, please write to us or send us an email (contact details below).

10.5. If you have a complaint about the way in which we use your personal data you have the right to complain to the Information Commissioner (www.ico.gov.uk).

11. Questions and comments

Please contact us if you would like further information about this privacy policy or if you are concerned about the security or use of your personal data.

Contact details

Internet@TSP, 124 Corve Street, Ludlow, Shropshire, SY8 2PG, United Kingdom

Telephone: 01584 874353

Email: info@internet-tsp.co.uk

Website: www.internet-tsp.co.uk

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