



SEPTEMBER 2021

**PRIVACY POLICY**  
GENERAL

MINSTER MICRO COMPUTERS LIMITED



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## **1. Introduction**

- 1.1 In this policy, "we", "us" and "our" refer to Minster Micro Computers Limited. For more information about us, see Section 9.
- 1.2 We ensure that we gather, store and handle data fairly, transparently and in line with both the GDPR regulations as well as individual rights.
- 1.3 This policy will refer to all parties (employees, job candidates, customers, suppliers etc.) who provide any information to us.
- 1.4 We are committed to safeguarding the privacy of Minster's employees, customers, stakeholders and other interested parties.
- 1.5 All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action.

## **2. Policy Elements**

- 2.1 As part of our operations, we need to obtain and process information. This information includes any offline or online data that makes a person identifiable such as names, addresses, usernames and passwords, digital footprints, images, financial data etc.
- 2.2 Our company collects this information in a transparent way and only with the full cooperation and knowledge of interested parties.

## **3. Your personal data**

- 3.1 In this Section 3 we have set out:
  - (a) the personal data that we may process;
  - (b) the purposes for which we may process personal data;
  - (c) the legal bases of the processing; and
  - (d) other reasons we may process your data.
- 3.2 Depending on how you are affiliated with Minster, such as a website visitor or through your employer, we may process personal data about you which may include:
  - name;
  - date of birth;
  - gender;
  - business/company name
  - job title;
  - profession;
  - contact information such as email addresses and telephone numbers;

- demographic information such as post code, preferences, and interests; and
- financial information.

3.3 Your data may be processed for the purposes of:

- Providing and managing your account;
- Personalising and tailoring your experience with Minster;
- Supplying our products and/or services to you;
- Personalising and tailoring our products and/or services for you;
- Replying to emails from you;
- Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by following the instructions included with the email);
- Market research;
- Analysing your use of our website and/or other services in order to gather feedback to enable us to continually improve your user experience. You can read more about our Cookie policy [here](#).

3.4 The legal basis for all of the processing is our legitimate interests, namely the proper administration of our business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

3.5 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

3.6 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

3.7 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

3.8 Please do not supply any other person's personal data to us, unless we prompt you to do so.

#### 4. Providing your personal data to others

4.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage,

managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

- 4.2 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

## **5. International transfers of your personal data**

- 5.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred to [countries outside the European Economic Area (EEA)].
- 5.2 While the majority of the data we hold is in the UK, some or all of your data may be stored outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). If Minster do store data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.
- 5.3 Our suppliers, subcontractors and partners of Minster may be based outside of the EU (such as Northern Ireland and the USA). Transfer of your data to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission.
- 5.4 You acknowledge that personal data that you submit for publication through our website may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

## **6. Retaining and deleting personal data**

- 6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes or up to a maximum of 6 years.
- 6.3 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **7. Amendments**

- 7.1 We may update this policy from time to time.
- 7.2 We may notify you of changes to this policy by email or other methods.

## **8. Your rights**

- 8.1 In this Section 8, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.
- 8.2 Your principal rights under data protection law are:
- (a) the right to access;
  - (b) the right to rectification;
  - (c) the right to erasure;
  - (d) the right to restrict processing;
  - (e) the right to object to processing;
  - (f) the right to data portability;
  - (g) the right to complain to a supervisory authority; and
  - (h) the right to withdraw consent.
- 8.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge within 30 days of receipt, but additional copies may be subject to a reasonable fee.
- 8.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 8.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.
- 8.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal

data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

- 8.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 8.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 8.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 8.10 To the extent that the legal basis for our processing of your personal data is:
- (a) consent; or
  - (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,
- and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 8.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- 8.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 8.13 You may exercise any of your rights in relation to your personal data by written notice to us.
- 9. Our details**
- 9.1 This privacy policy is for customers, employees, stakeholders and other interested parties of Minster Micro Computers Limited.

9.2 We are registered in England and Wales under registration number 2095504 and our registered office is at Minster House, 115 Worcester Road, Kidderminster, Worcestershire, DY10 1HU.

9.3 Our principal place of business is at Minster House, 115 Worcester Road, Kidderminster, Worcestershire, DY10 1HU.

9.4 You can contact us:

- (a) by post, to the postal address given above;
- (b) using our website contact form;
- (c) by telephone, on the contact number published on our website from 9AM-5PM Monday - Friday; or
- (d) by email, using the email address published on our website.

## **10. Data protection officer**

10.1 Our data protection team can be contacted on: [mydata@minstermicro.co.uk](mailto:mydata@minstermicro.co.uk)

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