



Privacy Policy Notice

This privacy policy notice applies to this website; www.itempathy.com and is owned and managed by **IT Empathy Limited**, 4 Staveley Close, Aylesbury, Buckinghamshire, United Kingdom. HP21 9DB and governs the privacy of those who use it. The purpose of this policy is to explain to you how we control, process, handle and protect your personal information while browsing or using this website, including your rights under current laws and regulations. If you do not agree to the following policy you may wish to cease viewing / using this website.

Policy key definitions:

- "I", "our", "us", or "we" refer to the business, [IT Empathy Limited, IT Empathy].
- "you", "the user" refer to the person(s) using this website.
- GDPR means General Data Protection Act.
- PECR means Privacy & Electronic Communications Regulation.
- ICO means Information Commissioner's Office.
- Cookies mean small files stored on a computer or device.

Processing of your personal data

Under the GDPR (General Data Protection Regulation) we control and / or process any personal information about you electronically using the following lawful bases.

- We are registered with the ICO under the Data Protection Register, our registration number is: ZA430322.

Lawful basis: Consent

The reason we use this basis: We use contact information to communicate with you via basic communication tools like email, phone, text, or modern online equivalent technology.

We process your information in the following ways: We store your contact information in our CRM database. This data resides in Office365 and is only accessible by our employees.

Data retention period: We will continue to process your information under this basis until you withdraw consent, or it is determined your consent no longer exists.

Sharing your information: We do not share your information with third parties.

Lawful basis: Contract

The reason we use this basis: When we are contracted to perform agreed services, our employees may need access to commercially sensitive data to deliver the necessary work.

We process your information in the following ways: We normally recommend a confidentiality agreement to ensure compliance with your specific needs and instructions for data usage to perform the agreed service activities.

Data retention period: We shall continue to process your information until the contract between us ends or is terminated under any contract terms.

Sharing your information: We do not share your information with third parties.



If, as determined by us, the lawful basis upon which we process your personal information changes, we will notify you about the change and any new lawful basis to be used if required. We shall stop processing your personal information if the lawful basis used is no longer relevant.

Your individual rights

Under the GDPR your rights are as follows. You can read more about [your rights in detail on the ICO link shown here: https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/)

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

You also have the right to complain to the ICO [www.ico.org.uk] if you feel there is a problem with the way we are handling your data.

We handle subject access requests in accordance with the GDPR.

A Subject Access Request (SAR) can be requested using a Subject Access Request email (guidance available via <https://ico.org.uk/your-data-matters/your-right-to-get-copies-of-your-data/preparing-and-submitting-your-subject-access-request/>), sending the email to enquiries@itempathy.com.

Cookies

We use cookies on this website to provide you with a rich user experience. We achieve this by placing a small text file on your device / computer hard drive to track how you use this website, to record or log whether you have seen messages that we display, to keep your session connected to the website where applicable, to display relevant adverts or content, referring you to a third-party specialist websites.

Some cookies are required to experience the full functionality of this website. Cookies will be saved for specific time periods, where others may last indefinitely. Your web browser should provide you with the controls to manage and delete cookies from your device, please see your web browser options.

Please refer to <https://www.itempathy.com/cookies.pdf> for more in-depth information on cookies.

Data Security and protection

We ensure the security of any personal information we hold by using secure data storage technologies and precise procedures in how we store, access, and manage that information. Our methods meet the GDPR compliance requirement.



Transparent Privacy Explanations

We have provided some further explanations about user privacy and the way we use this website to help promote a transparent and honest user privacy methodology.

Sponsored links, affiliate tracking and commissions

Our website may contain adverts, sponsored and affiliate links on some pages. These are typically served through our advertising & technology partners; Google AdSense, Amazon Affiliates, Belkin, Check Point, Intel, Microsoft, or are self-served through our own means. We only use trusted partners who each have high standards of user privacy and security. However, we do not have full control of the actual adverts seen / displayed by our advertising partners. IT Empathy weekly review these ads to ensure quality and relevance is maintained. Our ad partners may collect data and use cookies for ad personalisation and measurement. Where ad preferences are requested as 'non-personalised' cookies may still be used for frequency capping, aggregated ad reporting and to combat fraud and abuse.

Clickable, partner, social media, sponsored or affiliate links may be displayed as a website URL like this; www.amazon.co.uk/_1itepy.uk/, bit.ly/googleadservices.co.uk/,

Clicking on any adverts, sponsored or affiliate links may track your actions by using a cookie saved to your device. Your actions are usually recorded as a referral from our website by this cookie. In most cases we earn a very small commission from the advertiser or advertising partner, at no cost to you, whether you make a purchase on their website or not.

We use advertising partners in these ways to help generate an income from the website, which allows us to continue our work and provide you with the best overall experience and valued information.

If you have any concerns about this, we suggest you do not click on any adverts, sponsored or affiliate links found throughout the website.

Resources and further information

Under the GDPR we use the consent lawful basis for anyone that has consented to our newsletter or marketing mailing list. We only collect certain data about you, as detailed in the "Processing of your personal data" above. Any email marketing messages we send are done so through an EMS, email marketing service provider. An EMS is a third-party service provider of software / applications that allows marketers to send out email marketing campaigns to a list of users.

Email marketing messages that we send may contain tracking beacons / tracked clickable links or similar server technologies to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of data such as; times, dates, I.P addresses, opens, clicks, forwards, geographic and demographic data. Such data, within its limitations will show the activity each subscriber made for that email campaign.

Any email marketing messages we send are in accordance with the GDPR and the PECR. We provide you with an easy method to withdraw your consent (unsubscribe) or manage your preferences / the information we hold about you at any time. See any marketing messages for instructions on how to unsubscribe or manage your preferences.



Our EMS provider is Office 365. We hold the following information about you within our EMS system.

- Email address
- Subscription time & date
- First Name, Last Name, Phone Number, Job title, company Name

Resources and further information

- [Overview of the GDPR - General Data Protection Regulation](#)
- [Data Protection Act 1998](#)
- [Privacy and Electronic Communications Regulations 2003](#)
- [The Guide to the PECR 2003](#)
- [Twitter Privacy Policy](#)
- [Google Privacy Policy](#)
- [LinkedIn Privacy Policy](#)
- [Amazon Privacy Policy](#)
- [Microsoft Privacy Policy](#)