

## Privacy Policy

### Who we are

This policy applies to information we collect when you choose to use our website, and also to personal information which we process further to supplying services to our clients.

We take your privacy very seriously and we ask that you read this privacy policy carefully as it contains important information on the personal information we collect about you; what we do with your information and who your information might be shared with.

The website is operated by Staff Absence Management Limited and our registered office is at 28 Upper Bank End Road, Holmfirth, England, HD9 1EW.

Staff Absence Management Limited ('SAM', 'we' or 'us') are a 'data controller' for the purposes of the Data Protection Act 1998 and as of 25 May 2018, the General Data Protection Regulation ('GDPR') (as applicable the "Legislation") where we control the purposes for which we process your personal information. We are the data processor where we are processing your personal data in order to provide services to our clients. In either case we comply with the Legislation.

Any questions about our data protection policy or how we handle your personal data should be addressed to our data protection officer. (See Contact information below.)

### What information do we collect?

#### Personal information provided by you

We collect personal information about you (such as your name, address and contact details), for example your email address when you make an enquiry, register with us or purchase products or services from us. We also collect personal information when you contact us via the online form.

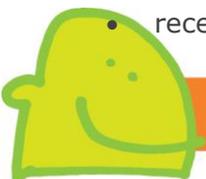
#### Personal information provided to and by third parties

We may receive or send information about you from and to other sources (namely our clients, our sister company FusionHR, service providers, associates and consultants) which we will add to the information we already hold about you in order to supply our clients with our services and to help us improve and personalise our services.

#### Personal information about other individuals

If you give us information on behalf of someone else, you confirm that either; (1) the other person has a contractual relationship with you and knows that you will be transferring their personal data to us for specific purposes and/or (2) s/he has appointed you to act on his/her behalf and has agreed that you can:

- give consent on his/her behalf to the processing of his/her personal data
- receive on his/her behalf any data protection notices



- give consent to the processing of his/her sensitive personal data (as listed below).

### **Sensitive/special category personal information**

We may process sensitive personal information in certain situations, for example when carrying out recruitment checks or specific investigations. If we request such information, we will explain why we are requesting it and how we intend to use it.

Sensitive personal information includes information relating to:

- physical or mental health or condition

We will only process your sensitive personal information with your explicit consent.

## **Use of Cookies**

A cookie is a small text file which is placed onto your computer (or other electronic device) when you use our website. We use cookies on our website.

Where applicable, this website uses a cookie control system allowing you on your first visit to the website to allow or disallow the use of cookies on your computer/device. This complies with recent legislation requirements for websites to obtain explicit consent from users.

For example, we may monitor *how many times you visit the website, which pages you go to, traffic data, location data and the originating domain name of a user's internet service provider*, to improve the user's experience whilst visiting the website, and better understand how you use it. This information helps us to build a profile of our users. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually.

You can set your browser not to accept cookies and the websites below tell you how to remove cookies from your browser. However, some of our website features may not function as a result.

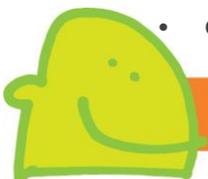
For further information on our use of cookies, including a detailed list of your information which we and others may collect through cookies please see our Website cookie policy.

For further information on cookies generally visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **How will we use the information about you**

We collect information about you so that we can:

- identify you and manage any accounts you hold with us
- provide the services requested
- if you agree, let you know about other products or services that may be of interest to you (see 'Marketing' section below)
- detect and prevent fraud
- customise our website and its content to your particular preferences



- notify you of any changes to our website or to our services that may affect you
- improve our services.

## Marketing and email newsletter

We use any information submitted to us by you to provide you with further information by post and email about the products and services we offer which you have requested, and/or which may be of interest to you.

As part of our services we supply an email newsletter which we use to inform you about products and services supplied by us. You may be contacted because you have requested a demo or brochure or because you are a client or existing contact of Staff Absence Management Limited. You can choose to unsubscribe at any point by clicking on the link at the bottom of the email.

Email marketing campaigns published by us may contain tracking facilities within the actual email. Subscribed activity is tracked and stored in a database for future analysis and evaluation. Such tracked activity may include: the opening of emails, forwarding of emails, the clicking of links within the email consent, times, dates and frequency of activity (this is by no means a comprehensive list).

## Who your information might be shared with

We may disclose your personal data to:

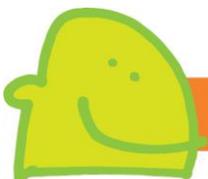
- other companies within our group
- our agents, associates and service providers
- law enforcement agencies in connection with any investigation to help prevent unlawful activity

## Keeping your data secure

Our staff and associates are bound by obligations of confidentiality and trained in the protection of personal data. We comply with the Legislation and use the appropriate technical and organisational measures necessary to safeguard your personal data. We only share your personal data with third parties who also comply with the Legislation.

While we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that is transferred from you or to you via the internet. If you have any particular concerns about your information, please contact us (see 'How can you contact us?' below).

We only send your data outside the EEA where we have in place a legal agreement which complies with the Legislation.



Staff Absence Management Ltd utilises software services, such as CRM which are hosted on Amazon Web Services (AWS) Cloud infrastructure, for more information please visit <https://aws.amazon.com/compliance/gdpr-center/> and <https://capsulecrm.com/security/>.

We use third party service, MailChimp.com, to deliver marketing information to current and potential clients regarding SAM and absence management updates. For more information about how MailChimp processes data, please visit <https://mailchimp.com/legal/privacy/>.

We also use the financial management system Xero for invoicing, please visit <https://www.xero.com/uk/campaigns/xero-and-gdpr/>.

Where data is stored outside the EU, additional independent checks have been undertaken to ensure the data security is of a sufficient level and meets adequacy requirements, in order to satisfy the EU GDPR requirements.

## What can I do to keep my information safe?

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

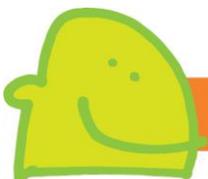
## Retention Periods

We store your personal data on secure servers in accordance with the criteria set out in our Retention Policy. Regulations and legislation require that we keep certain information for a dedicated time. This is all outlined in full in our Retention Policy.

## What rights do you have

The GDPR provides the following rights for individuals:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object to processing
8. Rights in relation to automated decision making and profiling (We do not carry out automated decision making and profiling)



### **Right to access – ie to request a copy of your information**

You can request a copy of your information which we hold (this is known as a subject access request). If you would like a copy of some or all of it, please write to us at The DPO, Staff Absence Management Limited, Suites 1 and 2 Ideas House, 98 Bradford Road, East Ardsley, Wakefield WF3 2JL or email [dpo@staffabsencemanagement.co.uk](mailto:dpo@staffabsencemanagement.co.uk);

- let us have proof of your identity (a copy of your driving licence or passport); and
- let us know what information you want.

### **Right to correct any mistakes in your information**

You can require us to correct any mistakes in your information which we hold free of charge. If you would like to do this, please email or write to us (see 'How can you contact us?' below)

- let us have enough information to identify you
- let us know the information that is incorrect and what it should be replaced with.

### **Right to remove your details from our records or restrict how we use your information**

You can ask us to stop contacting you for particular purposes or remove your information completely from our records. There may be a legal reason why we need to keep your personal data and in that circumstance we will destroy your personal information as soon as we are legally entitled to do so. If you would like us to stop contacting you with information about our services, please email or write to us (see 'How can you contact us?' below). You can also click on the 'unsubscribe' button at the bottom of the email and/or newsletter;

- let us know what method of contact you are not happy with if you are unhappy with certain ways of contacting you only (for example, you may be happy for us to contact you by email but not by telephone).

### **Right to lodge a complaint with the Supervising Authority**

If you have any concerns or complaints about how we use your personal data, we hope you will alert us to these directly (see the Contact information below). If you are still unhappy you are entitled to complain to the Information Commissioners Office (ICO) which is the supervising authority in the UK. Their contact details and the procedure can be found at [www.ico.gov.uk](http://www.ico.gov.uk)

## **How to contact us**

Please contact Ben Cain, our Data Protection Officer, if you have any questions about this privacy policy or the information we hold about you.

If you wish to contact us about any other matter;

- please send an email to [dpo@staffabsencemanagement.co.uk](mailto:dpo@staffabsencemanagement.co.uk)

or

- write to us at Suites 1 and 2 Ideas House, 98 Bradford Road, East Ardsley, Wakefield WF3 2JL.



## Changes to the Privacy Policy

We may change this privacy policy from time to time. You should check this policy occasionally to ensure you are aware of the most recent version that will apply each time you access this website or use our services.

LAST UPDATED - APRIL 2018

