

Privacy Policy



1. INTRODUCTION

This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers personal data or personal information that could identify you ("Personal Information"). In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.

We regret that if there are one or more points below with which you are not happy, your only recourse is to leave our website immediately.

We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them, and will not accidentally fall into the hands of a third party.

We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.

Our policy complies with UK law accordingly implemented, including that required by the General Data Protection Regulation (EU) 2016/679, otherwise known as the GDPR.

The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. We do this now, by requesting that you read the information provided at www.knowyourprivacyrights.org

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

2. WHO WE ARE

Controller

Simpatica Group Limited is made up of different legal entities, details of which can be found here. This privacy notice is issued on behalf of the Simpatica Group so when we mention "Simpatica", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the Simpatica Group responsible for processing your data. is the controller and responsible for this website.

The different legal entities within the group may, from time to time, share personal information collected about their customers and prospects, with other Simpatica Group companies.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance at info@telemisis.com.

3. THE PERSONAL INFORMATION WE COLLECT ABOUT YOU

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes contact address, billing address, delivery address, email address and telephone numbers.

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- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Profile Data includes your purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, products and services.
- Marketing and Communications Data includes your consent and preferences in receiving marketing from us and other Simpatica Group companies and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data:

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

4. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including:

- Direct interactions. You may give us your Identity, Contact and Financial Data, through corresponding with us when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including our products and services.
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

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- Technical Data from the following parties:
 - (a) analytics providers such as Google based outside the EU;
 - (b) advertising networks such as Google Adwords based outside the EU; and
 - (c) search information providers such as Google, Yahoo or Bing based inside or outside the EU.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Visa or Mastercard.
- Identity and Contact Data from data brokers or aggregators such as Experian
- Identity and Contact Data from publicly available sources such as Companies House

5. THE PURPOSE AND BASIS ON WHICH WE PROCESS INFORMATION ABOUT YOU

The law requires us to determine under which of six defined bases we process different categories of your Personal Information, and to notify you of the basis for each category, please find below in table format said information. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose / Activity	Type of Data	Lawful Basis for Processing
To register you as a new customer, a customer partnership or a purchasing & supplier partnership, to process and deliver orders to you, and manage our on going relationship	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Usage (f) Technical (g) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) and to deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer/supplier relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Consent to receipt of such promotional messages

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6. CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the rules set out in this policy, where this is required or permitted by law.

7. COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly, such as re-marketing services on third-party websites.

For more information about the cookies we use, please see our cookie policy.

8. INTERNATIONAL TRANSFERS

We may transfer personal data outside of the European Economic Area (EEA), where we do so we will ensure that; such transfers are compliant with GDPR and that appropriate measures are put in place to keep your personal data secure.

9. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

10. RETENTION PERIOD FOR PERSONAL DATA

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

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11. ACCESS TO YOUR PERSONAL INFORMATION

At any time you may review or update personally identifiable information that we hold about you, by sending a request to info@telemisis.com

After receiving the request, we will tell you when we expect to provide you with the information. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

11.1. REMOVAL OF YOUR INFORMATION

Request of erasure enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

If you wish us to remove personally identifiable information from our systems please contact us, by sending a request to info@telemisis.com

11.2. VERIFICATION OF YOUR INFORMATION

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information. We may also contact you to ask you for further information in relation to your request to speed up our response.

11.3. COMPLIANCE WITH THE LAW

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you. However, ultimately it is your choice as to whether you wish to use our website.

12. MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

12.1. PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services, and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased products or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have opted in to receiving that marketing.

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12.2. OPTING OUT

You can ask us, or third parties, to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of product or service purchase, or other transactions.

13. THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications such as social media links to Facebook and YouTube. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

14. REVIEW OF THIS PRIVACY POLICY

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

15. CONTACT

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to info@telemisis.com

COOKIE POLICY.

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a great experience when you browse our website and also allows us to improve our website. By continuing to browse the website, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- (a) Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, third-party social plug-in content sharing cookies.
- (b) Analytical/performance cookies: They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- (c) Functionality cookies: These are used to recognise you when you return to our website. This enables us to personalise our content for you, and remember your preferences (for example, your choice of language or region).
- (d) Targeting cookies: These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and any advertising displayed more relevant to your interests. We may also share this information with third parties for this purpose.

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Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

Changes to our cookie policy:

Any changes we may make to our cookie policy in the future will be posted on this page.

Contact:

Questions, comments and requests regarding this Cookie Policy are welcomed and should be addressed to info@telemisis.com

CONTACT.

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