

Data Protection and Privacy Policy

This is our updated Privacy Policy taking effect on 25 May 2018.

Your privacy is critically important to us.

At A P Systems, we have a few fundamental principles:

- We are thoughtful about the personal information we ask you to provide and the personal information that we collect about you through the operation of our services.
- We store personal information for only as long as we have a business reason to keep it.
- We aim to make it as simple as possible for you to control the information that we keep regarding your business.
- We aim for full transparency on how we gather, use, and share your personal information.

Below is our *Data Protection and Privacy Policy*, which incorporates and clarifies these principles.

Who We Are and What This Policy Covers

This Privacy Policy applies to information that we collect about you when you use:

- Our websites (including A P Systems.com and Woodford-IT.co.uk);
- Our products that are available on or through our websites;
- Our services that are carried out on your behalf including IT services, help desk support and other computer services.

Throughout this Privacy Policy we'll refer to our website and our products and services collectively as "Services."

Below we explain how we collect, use, and share information about you, along with the choices that you have with respect to that information.

Information We Collect

We only collect information about you if we have a reason to do so — for example, to provide our Services, to communicate with you, or to make our Services better.

We collect information in three ways: if and when you provide information to us, automatically through operating our Services, and from outside sources. Here is a summary of the information that we collect.

Information You Provide to Us

It's probably no surprise that we collect information that you provide to us. The amount and type of information depends on the context and how we use the information. Here are some examples:

- **Basic Account Information:** We ask for basic information from you in order to set up your account. For example, we require individuals who sign up for an account with us to provide a username and email address — and that's it. You may provide us with more information — such your name — but we don't require that information to create an account.
- **Public Profile Information:** If you have an account with us, we collect the information required to provide our services to you. For example, we record details of the computer systems and other IT equipment that is included in the support services that we cover for you. However, we do not create a 'Public Profile' of you or your company, nor do we pass your details on to other companies as part of any advertising, marketing, or other similar scheme.
- **Transaction and Billing Information:** If you buy something from us — a computer, a printer, or other IT equipment for example — you will provide additional personal and payment information that is required to process the transaction and your payment, such as your name, credit card information, and contact information.
- **Credentials:** Depending on the Services you use, you may provide us with credentials for your computer equipment or website (such as a Microsoft server, a network login, or other usernames and passwords). These details are held in our secure information vaults and are never divulged to 3rd parties.
- **Communications with Us:** You may also provide us information when you respond to surveys, communicate with our IT engineers about a support question, or post a question or initiate a support call concerning your network, computers, or web site in our help desk system.

Information We Collect Automatically

We also collect some information automatically:

- **Log Information:** Like most IT service providers, we collect information on your IT equipment, such as the computer names, IP addresses, unique device identifiers, operating systems, etc. We collect log information when you use our Services — for example, when you create or edit information in our help desk system or provide us with a remote session for the purposes of IT support. However, only data that is essential to the carrying out of our computer services on your behalf is retained.

How And Why We Use Information

Purposes for Using Information

We use information about you as mentioned above and for the purposes listed below:

- To provide our Services — for example, to set up and maintain your account, maintain your computer equipment, host your website, backup and restore your data, or charge you for any of our paid Services;
- To further develop and improve our Services — for example by adding new features that we think our customers will appreciate or will help them to create and manage their websites more efficiently;
- To measure, gauge, and improve the effectiveness of our advertising, and better understand user retention and attrition — for example, we may analyse how many companies purchase a support contract after receiving a marketing message, or the features used by those who continue to use our Services after a certain length of time;
- To monitor and prevent any problems with our Services, protect the security of our Services, detect and prevent fraudulent transactions and other illegal activities, fight spam, and protect the rights and property of A P Systems and others, which may result in us declining a transaction or the use of our Services;
- To communicate with you, for example through an email, about offers and promotions offered by A P Systems that we think will be of interest to you, solicit your feedback, or keep you up to date on A P Systems and our products; and
- To personalize your experience using our Services, target our marketing messages to groups of our users, and serve relevant advertisements.

Legal Bases for Collecting and Using Information

Under European Union law, specifically the GDPR (General Data Protection Regulation), our use of your information is based on the grounds that:

(1) The use is necessary in order to fulfil our commitments to you under our Terms of Service or other agreements with you or is necessary to administer your account — for example, in order to provide access to your network or to a computer covered by a support agreement; or

(2) The use is necessary for compliance with a legal obligation; or

(3) The use is necessary in order to protect your vital interests or those of another person; or

(4) We have a legitimate interest in using your information — for example, to provide and update our Services, to improve our Services so that we can offer you an even better user experience, to safeguard our Services, to communicate with you, to measure, gauge, and improve the effectiveness of our advertising, and better

understand user retention and attrition, to monitor and prevent any problems with our Services, and to personalize your experience; or

(5) You have given us your consent.

Sharing Information

How We Share Information

We do not sell our customers' personal information.

We share information about you in the limited circumstances spelled out below and with appropriate safeguards on your privacy:

- **Subsidiaries, Employees, and Independent Contractors:** We may disclose information about you to our subsidiaries, our employees, and individuals who are our independent contractors that need to know the information in order to help us provide our Services or to process the information on our behalf. We require our subsidiaries, employees, and independent contractors to follow this Data Protection and Privacy Policy, and to fully comply with EU legislation specified in the GDPR, for personal information that we share with them.
- **Third Party Vendors:** We may share information about you with third party vendors who need to know information about you in order to provide their services to us, or to provide their services to you or your site. This group includes vendors that help us provide our Services to you (such as payment providers that process your credit and debit card information, fraud prevention services that allow us to analyse fraudulent payment transactions, postal and email delivery services that help us stay in touch with you, customer chat and email support services that help us communicate with you, registrars, registries, and your hosting provider if your site hosting is managed by A P Systems), or those that assist us with our marketing efforts (e.g. by providing tools for identifying a specific marketing target group or improving our marketing campaigns). We require vendors to agree to privacy commitments in order to share information with them.
- **Legal Requests:** We may disclose information about you in response to a subpoena, court order, or other governmental request.
- **To Protect Rights, Property, and Others:** We may disclose information about you when we believe in good faith that disclosure is reasonably necessary to protect the property or rights of A P Systems, third parties, or the public at large. For example, if we have a good faith belief that there is an imminent danger of death or serious physical injury, we [may disclose information related to the emergency without delay](#).
- **Business Transfers:** In connection with any merger, sale of company assets, or acquisition of all or a portion of our business by another company, or in the unlikely event that A P Systems goes out of business or enters bankruptcy, user information would likely be one of the assets that is transferred or acquired by a third party. If any of these events were to happen, this *Data Protection and*

Privacy Policy would continue to apply to your information and the party receiving your information may continue to use your information, but only consistent with this *Data Protection and Privacy Policy*.

- **With Your Consent:** We may share and disclose information with your consent or at your direction. For example, we may share your information with third parties only with your explicit authority to do so.

How Long We Keep Information

We generally discard information about you when we no longer need the information for the purposes for which we collect and use it — which are described in the section above on *How and Why We Use Information* — and we are not legally required to continue to keep it.

For example, we keep the server logs that record information about a technical problem that we are requested to manage on your behalf. We retain these logs for as long as is reasonable to enable us to provide you with the best possible service.

Security

We work very hard to protect information about you against any unauthorized access, use, alteration, or destruction, and take reasonable measures to do so, such as monitoring our Services for potential vulnerabilities and attacks.

Your Rights

If you are located in a country other than the UK, including those that fall under the scope of the European *General Data Protection Regulation*, data protection laws give you rights with respect to your personal data, subject to any exemptions provided by the law, including the rights to:

- Request access to your personal data.
- Request correction or deletion of your personal data.
- Object to our use and processing of your personal data.
- Request that we limit our use and processing of your personal data; and
- Request portability of your personal data.

You can choose to access, correct, or delete any of the personal data that we hold on your behalf.

EU individuals also have the right to make a complaint to a government supervisory authority.

How to Reach Us

If you have a question about this *Data Protection and Privacy Policy*, or you would like to contact us about any of the rights mentioned in the *Your Rights* section above, please contact us via our web site: www.a-p-systems.com.