

PRIVACY NOTICE

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1. INTRODUCTION

We appreciate the trust you place in us when sharing your personal data. The security of that data is very important to us. In this document, we will explain how we collect, use and protect your personal data.

We will also explain what rights you have with regards to your personal data and how you can exercise those rights.

2. WHO WE ARE

Nastek Ltd is an independent and qualified business technology consulting service. Our core services provide technical solution architecture and implementation services across a wide spectrum of vendor provided technologies. We are a consortium of highly-skilled professionals, each specialised and fully accredited within their particular chosen fields of expertise. We have also established partnerships with key vendors to ensure that we can offer the best possible products, designs, and solutions.

Nastek Ltd is the data controller which means that Nastek Ltd determines what data is collected, how this data is going to be used and how this data is protected.

Our registered office address is:

Nastek Ltd
 22 Stapleton Close,
 Marlow,
 Buckinghamshire
 SL7 1TZ

Our postal address is:

Nastek Ltd
 PO BOX 3897
 Marlow
 Buckinghamshire
 SL7 9A

If you have questions about how we process personal data, or would like to exercise your data subject rights, please email us at info@nastek.co.uk

3. COLLECTION OF PERSONAL DATA

Personal data is any information about a living individual which allows them to be identified from the data.

We collect personal data from you or one of the sources identified below for one or more of the following purposes:

1. To provide you with services you requested from us.
2. To initiate and complete commercial transactions with you, or the entity that you represent, for the purchase of products and/or services.
3. To fulfil a contract offer to you, or your LTD company (or chosen Umbrella Company) so we can utilise your consultancy services.
4. To manage any communication between you and us.
5. If you wish to exercise any of the data subjects' rights.

The table in section 6 below provides more detail about the data that we collect for each of these purposes, the lawful basis for doing so, and the period for which we will retain each type of data.

4. SOURCE OF YOUR PERSONAL DATA

We may have collected or received your personal data from any of the following:

- Yourself when you contacted us directly
- LinkedIn
- Any advert you apply to via: Jobserve.com / Totaljobs.com / jobsite.co.uk

5. COOKIE POLICY

If you visit our website at <http://www.nastek.co.uk/> we will not collect any cookies from any of your devices.

6. LAWFUL BASIS FOR THE PROCESSING OF PERSONAL DATA

The table below describes the various forms of personal data we may have received from various sources and the lawful basis for processing this data. Some data may be shared with third parties; where this happens, this is also identified below.

Purpose of collection	Information category	Data collected	Purpose for collection	Lawful basis for processing	Data shared with?	Retention period
1. Provide you with service.	Contact information.	Name, address, contact details.	To ensure Nastek deliver you the service you have requested.	Contractual performance	Internally and any third party with whom we contract in order to fulfil these requirements.	Maximum six years from the date of the performance of the contract. Eight years for VAT records from the performance of the contract.

2. Transactional information.	Transaction details.	Name, name of the company, physical address, email address, telephone number.	To process invoices for the engagement delivered by you or your company and to ensure any transaction issues can be dealt with.	Contractual performance	Internally and third party we engaged with.	Maximum eight years from the date of the performance of the contract. Six months from the date the data subject has input personal information but has not proceeded with a transaction.	
			For accounting and taxation purposes	Legal obligation	Internally and third party we engaged with for accounting purposes.	Eight years for VAT records from the performance of the contract.	
			Documentation should any contractual legal claim arise.	Legitimate Interest	Internally and, as necessary, with professional advisers.		
3. Fulfilment of a contract offer.	Fulfilment data	Name, address(es), email address, contact details, nationality, date of birth, gender, education history, qualifications, work history, work references, photograph.	To share your CV or tech profile (if it includes any personal data) with our prospective clients.	Contractual performance	Internally and any third parties that may be interested using your services.	Maximum of one year if successful, and maximum of six months if unsuccessful.	
			Passport.	To ensure that you have the right to work in the UK.	Legal Obligation	Internally and any third parties that may be interested using your services.	We will only collect it if necessary to fulfil the contract, and we will keep it for the duration of the engagement and 2 years after to comply with the Immigration, Asylum and Nationality Act 2006.
			Communications with you and any other information about the contract offer.	Documentation should any contractual legal claim arise.	Legitimate Interest	Internally and, as necessary, with professional advisers.	Maximum six years from the date of the performance of the contract.
4. Communications	Contact information	Names, contact details, identification details.	To communicate with you about any issue that you raise with us or which follows from an	Contractual performance	Internally and, as necessary, with professional advisers.	Relevant statutes of limitation.	

			interaction between us.			
5. The exercise of data subject rights	Verification data	Name, email address, address, and ID if deemed necessary.	To verify your identity so that we can accommodate your data subjects' rights.	Legal obligation	Internally and, as necessary, with professional advisers.	General Data Protection Regulation Data Protection Act 2018

7. SHARING YOUR DATA WITH THIRD PARTIES

We do not sell, otherwise disclose, or share information we collect and hold about you, except as described in this Privacy Notice.

We also may disclose information about you: (i) if we are required to do so by law, regulation or legal process (such as a court order or subpoena) including lawful requests by public authorities to meet national security or law enforcement requirements; (ii) in response to requests by government agencies, such as law enforcement authorities; (iii) for the purpose of or in connection with legal proceedings, or otherwise for the purpose of establishing, exercising or defending our legal rights; or (iv) when we believe disclosure is necessary or appropriate in connection with an investigation of suspected or actual illegal activity.

We reserve the right to transfer any information we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganisation, dissolution or liquidation), but only where we have first taken reasonable steps to ensure the security and confidentiality of your information.

8. TRANSFER OUTSIDE OF THE EEA.

We are not transferring any personal data outside of the EEA.

9. YOUR RIGHTS AS A DATA SUBJECT

As a data subject whose personal information we hold, you have certain rights. If you wish to exercise any of these rights, please email info@nastek.co.uk so that we can process your request, we will ask you to provide a valid form of identification for verification purposes. Your rights are as follows:

- **The right to be informed**

As a data controller, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy notice and any related communications we may send you.

- **The right of access**

You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you as well as the following information:

- a) The purposes of the processing
- b) The categories of personal data concerned
- c) The recipients to whom the personal data has been disclosed

- d) The retention period or envisioned retention period for that personal data
- e) When personal data has been collected from a third party, the source of the personal data

If there are exceptional circumstances that mean we can refuse to provide the information, we will explain them. If requests are frivolous or vexatious, we reserve the right to refuse them. If answering requests is likely to require additional time or occasions unreasonable expense (which you may have to meet), we will inform you.

- **The right to rectification**

When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.

- **The right to erasure (the 'right to be forgotten')**

Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. This includes personal data that may have been unlawfully processed. We will take all reasonable steps to ensure erasure.

- **The right to restrict processing**

You may ask us to stop processing your personal data. We will still hold the data, but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies you may exercise the right to restrict processing:

- a) The accuracy of the personal data is contested.
- b) Processing of the personal data is unlawful.
- c) We no longer need the personal data for processing but the personal data is required for part of a legal process.
- d) The right to object has been exercised and processing is restricted pending a decision on the status of the processing.

- **The right to data portability**

You may request your set of personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of consent, the processing is by automated means and if the processing is based on the fulfilment of a contractual obligation.

- **The right to object**

You have the right to object to our processing of your data where:

- Processing is based on legitimate interest;
- Processing is for the purpose of direct marketing;
- Processing is for the purposes of scientific or historic research; or
- Processing involves automated decision-making and profiling.

10. AUTOMATED DECISION-MAKING, INCLUDING PROFILING

Nastek Ltd does not use automated decision-making including profiling.

11. CONTACT US

Any comments, questions or suggestions about this privacy notice or our handling of your personal data should be emailed to info@nastek.co.uk

Alternatively, you can contact us at the following postal address or telephone numbers:

Our postal address is:

Nastek Ltd

PO BOX 3897

Marlow

Buckinghamshire

SL7 9AB

Telephone: +44 (0) 845 527 7985

Fax: +44 (0) 845 527 7986

12. COMPLAINTS

Should you wish to discuss a complaint, please feel free to contact us using the details provided above. All complaints will be treated in a confidential manner.

Should you feel unsatisfied with our handling of your data, or about any complaint that you have made to us about our handling of your data, you are entitled to escalate your complaint to a supervisory authority within the European Union. For the UK, this is the ICO (Information Commissioner's Office), which is also our supervisory authority. Its contact information can be found at <https://ico.org.uk/global/contact-us/>.

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