

Last updated: February 2024

TS NOC LTD ("nocteam", "we", "us", "our") is committed to protecting your personal information and this Privacy Policy tells you how we collect your personal data, how we store it and how we use it. We ensure that we shall only use your information in line with all applicable UK data protection laws. Your information will be held in a secure environment, and access to it will be restricted according to the "need to know" principle.

### The information we collect about you.

We process the personal data of customers and prospects. We may collect, store and use the following personal information about you:

- Information that you provide to us when registering with us for a service.
- Information that you provide to us when requesting a brochure/custom quote through our website.
- Information that you provide to us to subscribe to our newsletter.

Please let us know if the personal data we hold about you needs to be corrected or updated.

- The data you provide to us includes:
  - Name
  - Address
  - Postcode
  - Country
  - Company name
  - Email address
  - Mobile number
  - How you heard about us
  - Information contained in or relating to any communications that you send to us or send through our website, including the communication content and any metadata associated with the communication.
  - Any other personal information that you choose to send us, including business cards.
  - You may only pass us another individual's personal data if you have that person's
    consent to do so on the understanding that their personal data will be processed as
    described in this policy.

We also collect information about your computer and about your visits to and use of the website. This includes collecting unique online identifiers such as IP addresses, which are numbers that uniquely identify a specific computer or other device on the internet. Please see our Cookies section for more details.

### How will we use your personal information.

We shall use your personal data for the following purposes:

- To provide our services to you.
- To provide you with information about these services, and to deal with enquiries and requests about them.
- To refer you to suppliers of goods or services in which you have expressed an interest.



- To send you marketing communications relating to our business which we believe to be of interest to you.
- To send you email notifications and newsletters.
- To administer our website, personalise it to you and keep it secure.
- To prevent fraud
- To verify compliance with the terms and conditions governing the use of our website

## Our legal basis for processing your personal information.

We promise that we shall only use your data in the way you wish, and we shall always respect your privacy. We process your data under the following legal grounds:

- The processing is necessary to meet contractual obligations into which you have entered. Failure to provide mandatory data fields identified by a '\*' will mean that we shall be unable to deliver our services to you.
- The lawful justification for sending you marketing communications about our business, services and news is because we have a legitimate business interest for your data to be used for this specific purpose. You are in complete control of your data and can choose not to receive these messages, either when you first provide your data, in every communication we send you afterwards by following the opt-out links on the communication or by contacting us. These marketing communications include:
  - Email notifications and letters where you have provided us with your email address.
  - Postal / telephone marketing, though we shall always cheque telephone numbers
    against the Telephone and Corporate Telephone Preference Services and will only
    make telephone calls to you where your number is listed if you have told us that we
    may do so.
- We may also match the data we collect with other data that we hold about you if you have been connected with Thenocteam before. We do this to build up a picture of your personal preferences and understand how you use thenocteam so that we only send you relevant messages.

# **Disclosing your Personal Data**

Your information will be used by the following parties under our control:

- The workers who deliver our services
- Third parties who provide a service to us:
  - Customer and prospect data to HubSpot Inc, who distributes our emails.
  - third parties dealing with us on your behalf.
  - business partners, suppliers and subcontractors for the performance of any contract we enter into with them or you.
- Members of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We shall keep your personal data within Thenocteam and our trusted third parties except where disclosure is required by law, for example to government bodies and law enforcement agencies.



### How long we keep your personal information.

We shall not keep your personal data for any longer than is necessary. Where your information is no longer required or is no longer relevant, we will ensure it is disposed of securely.

- Personal details for marketing information will be held for a period of 24 months since your last interaction with us.
- Personal details for employee administration will be held for a period of 6 years following the end of your employment with us.
- To make sure that you do not receive marketing from us after you have told us to stop sending it, we need to keep a record of that instruction with our contact details. We shall hold that information until you tell us otherwise.
- Where necessary, we shall keep your personal data for as long as required to do so by law; and where required to establish, exercise or defend our legal rights.

## Your rights and control over your personal data

Under the UK data protection legislation, you have the right to:

- Access your personal data by making a subject access request.
- Rectification, erasure or restriction of your information where this is justified.
- Object to the processing of your information where this is justified.
- Data portability
- Withdraw consent at any time.
- The right to lodge a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (<a href="www.ico.org.uk">www.ico.org.uk</a>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

To exercise any of these rights, please contact us using the details below:

Compliance Officer
TS NOC LTD

Email address: <a href="mailto:privacy@nocteam.co.uk">privacy@nocteam.co.uk</a>

### No fee usually required.

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 could refuse to comply with your request in these circumstances.

# What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.



### Time limit to respond.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

#### **Data Transfers**

We share your personal data within the TS Noc LTD Group. This will involve transferring your data outside the UK.

Many of our external third parties are also based in the UK so their processing of your personal data will not involve a transfer of data outside the UK. Some of the third parties may be based on other countries. These countries include:

- any of the countries in which we operate, including
  - Sri Lanka
  - United States of America
  - any other countries in which we operate.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

### **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.

### **Third-Party Websites**

Our website may contain links to and details of other websites that are outside our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you that will be used by them in accordance with their privacy policy, which may differ from ours. It will be helpful for you to read their privacy policy before providing them with your personal data.

### **Privacy and Cookies**

We will ask you to consent to our use of cookies in accordance with the terms of this policy when you first visit our website.



Cookies are small text files which are stored on your computer when you visit certain web pages. At thenocteam we use cookies to understand how our sites are used which helps us to improve your overall online experience. Some of the cookies we use are necessary for some of our sites to work whilst other cookies are used to provide tailored advertising by trusted third parties. To find out more about cookies, visit <a href="https://www.aboutcookies.org">www.aboutcookies.org</a>

Cookies do not typically contain any information that identifies a user, but other information that we hold about you may be linked to the information stored in, and obtained from, cookies.

**Strictly necessary** – These cookies are essential for certain features of our websites to work. These cookies do not record identifiable personal information and we do not need your consent to place these cookies on your device. Without these cookies some services you have asked for cannot be provided.

**Performance** – These cookies are used to collect anonymous information about how you use our websites. We use Google Analytics to help us understand our website and how the website is used, and to understand how effective our advertising is. We use this information to help us improve our websites and digital advertising. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. You can read their privacy policy at <a href="http://www.google.com/policies/privacy/">http://www.google.com/policies/privacy/</a>.

**Functionality** – These cookies are used to provide services or remember settings to enhance your visit, for example text size or other preferences. The information these cookies collect is anonymous and does not enable us to track your browsing activity on other websites.

**Targeting and Advertising** – These cookies are used by trusted third parties to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. Information contained in these cookies is anonymous and doesn't contain your personal information. To find out more about cookies used for targeting and advertising

follow www.youronlinechoices.com and www.networkadvertising.org.

## **Session Cookies and Persistent Cookies**

Session cookies expire when you close your browser or if you stay inactive for a certain time. Persistent cookies will persist even after the browser is closed. They are used to remember you so that you don't have to re-enter, for example, login information every time you revisit our website.

### Managing cookies

If you'd prefer to restrict, block or delete cookies placed by our website, you can use your browser to do this. Each browser is different, so cheque the 'Help' menu of your particular browser to learn how to change your cookie preferences. If you choose to disable all cookies, we cannot guarantee the performance of our websites and some features may not work as expected.

#### **Contact Us**

We are registered as a Data Controller with the UK Information Commissioner's Office, under registration number <registration number here>



This website is owned and operated by TS NOC LTD, registered in England and Wales under registration number 15354414, 1010 Cambourne Business Park, Cambridge, England, CB23 6DP. This is our head office and principal place of business.

If you have any questions about this policy or your personal data, please contact:

Compliance Officer TS NOC LTD

Email address: <a href="mailto:privacy@nocteam.co.uk">privacy@nocteam.co.uk</a>