

ASSET SERVICES LIMITED PRIVACY POLICY



Asset Services Limited (t/a Message Direct) (referred to in this document as **We, Our** or **Us** [as the context requires]) are committed to protecting and respecting your privacy.

This policy (together with the terms of use stated on www.message-direct.co.uk and any other documents referred to on it) sets out the basis on which any personal data We collect from you, or that you provide to Us, will be processed. Please read the following carefully to understand Our views and practices regarding your personal data and how We will treat it.

By visiting www.message-direct.co.uk and/or providing your personal data to Us either by phone, email or otherwise, you are accepting and consenting to the practices described in this policy.

For the purposes of the General Data Protection Regulation 2016 (referred to in this document as **GDPR**) and the Data Protection Act 2018 and the regulations made under them (referred to collectively in this document as the **DP Law**), is the customer with whom We have a contract for the provision of services and to whom We relay personal data to is the data controller and We are the data processor in relation to personal data as defined in the GDPR (referred to in this document as **Personal Data**).

We have appointed a nominated data protection representative for the purpose of the DP Law being Suzy Charman whose contact details are provided at the bottom of this Privacy Policy.

INFORMATION WE COLLECT FROM YOU

We will collect and process the following data about you:

- **Information you give us.** This is information about you that you give Us by filling in forms on www.message-direct.co.uk or other websites operated by Us (referred to collectively in this document as **our site**) or by corresponding with Us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, open an account or enter into a contact with Us, subscribe to our services, participate in functions on our site and/or provide Us with messages or information to be relayed to any person to whom We have a contract for services. The information you give Us may include your name, address, e-mail address, phone number, financial and credit card information, personal description and photograph or any other factual information about you or your business.

- **Information We collect about you.** With regard to each of your visits to our site We will automatically collect the following information:
 - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
 - information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for' page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page ,and any phone number used to call Our customer service number.
- **Information we receive from other sources.** This is information We receive about you if you use any of the services We provide. In this case, We will have informed you when We collected that data if We intend to share that data internally and/or combine it with data collected by Us. We will also have told you for what purpose We will share and combine your data. We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies). We will notify you when We receive information about you from them and the purposes for which We intend to use that information.

COOKIES

Our site uses cookies to distinguish you from other users of our site. This helps Us to provide you with a good experience when you browse our site and also allows Us to improve our site. For detailed information on the cookies We use and the purposes for which We use them, please see the Cookie policy on our site.

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- **Information you give to Us.** We will use this information:
 - to carry out our obligations arising from any contract entered into between you and Us and to provide you with the information, products and services that you request from Us;
 - to relay messages provided by you via phone, email or otherwise to customer with whom We have a contract for the provision of services;
 - to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
 - to provide you with information about services We feel may interest you;

- to notify you about changes to Our services; and
- to ensure that content from our site is presented in the most effective manner for you and for your computer.
- **Information We collect about you.** We will use this information:
 - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical, accounting and survey purposes;
 - to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
 - to allow you to participate in interactive features of our site;
 - as part of Our efforts to keep our site safe and secure;
 - to measure or understand the effectiveness of advertising We serve to you and others, and to deliver relevant advertising to you;
 - to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
- **Information We receive from other sources.** We will combine this information with information you give to Us and information We collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information We receive).
- **Failure to provide personal information.** Where We require personal information in order to be able to enter into a contract with you, or to perform a contract, your failure to supply the information will prevent the effecting or performance of the contract and We will have no liability for any loss which results from the failure to supply the required data.
- **How long We will hold the information.** We will hold the information for so long as is reasonably required to enable Us to perform any contract We have with you and for a reasonable period thereafter. We will review the information held on a periodic basis and delete information which We assess will no longer be required for any future dealings between you and Us.

DISCLOSURE OF YOUR INFORMATION

You agree that We have the right to share your personal information with selected third parties including:

- business partners, suppliers and sub-contractors for the performance of any contract We enter into with you;
- advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to Our advertisers, but We may provide them with aggregate information about Our users.

- analytics and search engine providers that assist Us in the improvement and optimisation of our site;
- credit reference agencies for the purpose of assessing your credit score where this is a condition of Us entering into a contract with you.

We may disclose your personal information to third parties:

- in the event that We sell Our business or assets and/or merge with any third party business, in which case We may disclose your personal data to such prospective buyer or merger partner;
- if required in connection with the obtaining of any professional or other advice from any third parties;
- if We are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply any provision of any contract that We are a party to, or to protect the rights, property, or safety of Us, Our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We will not disclose your personal information to third parties if you are calling Us with the intention of contacting an individual or company with whom We have a contract for the provision of services.

WHERE WE STORE YOUR PERSONAL DATA

The data that We collect from you will be transferred to, and stored at, a destination inside the European Economic Area (referred to in this document as the **EEA**). It will also be processed by staff operating inside the EEA who work for Us. This includes staff engaged in, among other things, the fulfilment of any contract to which We are a party, the processing of payment details and the provision of support or other services. By submitting your personal data, you agree to this transfer, storing and processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

If in the future your personal data is transferred by Us outside the EEA for processing or storage, we will ensure that any such transfer is made in accordance with the requirements of the DP Law.

All information you provide to Us is stored on Our secure servers. Any payment transactions will be encrypted using SSL technology.

Unfortunately, the transmission of information via the internet is not completely secure. Although We will do our best to protect your personal data, in accordance

with good business practice, We cannot guarantee the security of your data transmitted to our site at all times; any transmission is at your own risk. Once We have received your information, We will put in place and apply strict procedures and security features to try to prevent any unauthorised third party access.

YOUR RIGHT TO OBJECT TO DATA PROCESSING

You have the right to ask Us not to process your personal data for marketing or any other purposes at any time. We will usually inform you (before collecting your data) if We intend to use your data for marketing purposes or if We intend to disclose your information to any third party for any marketing or similar purposes.

You can exercise your right to prevent such processing by checking certain boxes on the forms We use to collect your data. You can also exercise the right to prevent processing at any time by contacting Us at info@messagedirect.co.uk.

However, We have the right to continue to process the information where We have compelling legal grounds to do so or if the processing is required by Us in connection with legal claims.

Our site may, from time to time, contain links to and from the websites of Our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that We do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

ACCESS TO INFORMATION

The DP Law gives you the right to access information held about you. Your right of access can be exercised in accordance with the DP Law.

RECTIFICATION

The DP Law also gives you the right to require your personal data held by Us to be rectified if it is inaccurate or incomplete. Your right of access can be exercised in accordance with procedures stated in the DP Law.

ERASURE

Under the DP Law you may in some circumstances be entitled to have your personal information erased if the processing causes unwarranted and substantial damage or distress. You should notify the relevant data controller of the circumstances in accordance with the DP Law if you wish to exercise this right.

RESTRICTION OF PROCESSING

Under the DP Law you may in some circumstances also be entitled to restrict or block Our processing of your personal information. You should notify the relevant data controller of your request and the relevant circumstances in accordance with the DP Law if you wish to exercise this right.

DATA PORTABILITY

The DP Law gives you the right to obtain and port your personal data held by Us to another IT environment. If you notify Us that you wish to exercise this right, We will arrange the transfer in machine readable form to another IT environment within one month if it is technically possible, or within two months if the transfer is complex or if there have been multiple requests.

AUTOMATED DECISION MAKING

You also have the right under the DP Law in some circumstances not to be the subject of a decision based on automated processing or profiling which produces a legal effect or other significant effect on you. If you wish to exercise this right, you should make an objection in accordance with the provisions of the DP Law.

CHANGES TO OUR PRIVACY POLICY

Any changes We make to Our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to this Privacy Policy.

COMPLAINTS

If We have committed any infringement of the DP Law, you have the right to lodge a complaint with the relevant regulatory authority in the United Kingdom. The details of the regulator are as follows:

Name Information Commissioner's Office
Website ico.org.uk/concerns/
Address Wycliffe House, Water Lane, Wilmslow SK9 5AF
Phone 0303 123 1113

CONTACTS

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Suzy Charman and emailed to info@messagedirect.co.uk.

Asset Services Limited
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