

## Privacy Policy

PayPerCustomer Limited

### Privacy Statement Summary:

Who will use my data?	Paypercusomer Ltd
What for?	As a client or potential client, we will store and process your data in order to allow us to provide our lead generation and third-party marketing services to you. We may also send you offer details that we think you will be interested in. This may include a range of our related services. We may also use your data to process financial transactions. As an individual or as a company where we have collected, stored, or processed your data on behalf of one of our clients we will use your information as part of our lead generation or marketing service and where appropriate pass your details onto our client to allow them to contact you regarding their services.
What will happen if I contact you?	If you contact us as a potential client we will use your information to send you the information you have requested and updates, offers and other information that we think you will be interested in. If you contact us as an individual or company we will use your information to respond to your query or request as appropriate.
What data will be stored?	We will store your personal details in order to provide our services to our clients and to respond to your request.
What data will be shared?	We will not share your data with any third parties other than as described here. We may need to share your information with any regulator or legal body that requests it.
How long?	Your data will be stored as explained in our Data Retention Document. This will not normally be for more than 7 years after the end of our relationship after which time your data will be deleted.
Who can access my data?	We will never sell, share or otherwise distribute your data to any other third party other than as described here and always as you would reasonably expect a lead generation company to behave.
How is my data kept secure?	We will store your data on secure EU based servers. We use industry standard security protocols/technology to secure data at all times. For more information please see a copy of our Information Security policy.

We take your privacy seriously and will only use your personal information to respond to your request and as required to run our business. As a potential client we may from time to time send you information about services you may be interested in. We will never sell, share or use your personal information other than as described here.

## About This Privacy Policy

This policy sets out how we will use and share the information that you give us. This policy describes your relationship with Paypercustomer Ltd. The General Data Protection Regulation (GDPR) describes how organisations must collect, handle, process and store personal information. These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully. GDPR is underpinned by eight important principals. These say that personal data must:

- Be processed fairly and lawfully
- Be obtained only for specific, lawful purposes
- Be adequate, relevant and not excessive
- Be accurate and kept up to date
- Not be held for any longer than is necessary
- Processed in accordance with the rights of the data subjects
- Be protected in appropriate ways
- Not be transferred outside the European Economic Area, unless that country or territory also ensures an adequate level of protection
- We take these responsibilities seriously, this document describes our approach to data protection.
- This policy helps to protect us from data security risks, including:
  - Breaches of confidentiality. For instance, information being given out inappropriately.
  - Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them.
  - Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.

## Who We Are And How To Contact Us

PayPerCustomer is a trading name of PayPerCustomer Ltd that is registered in the UK and is registered with the Information Commissioner's Office. The data controller is: George Robinson. You can contact us in any of the following ways:

Email: [support@paypercustomer.co.uk](mailto:support@paypercustomer.co.uk)

Website: [www.paypercustomer.co.uk](http://www.paypercustomer.co.uk)

Post: PayPerCustomer Limited, Ground Floor Offices, 39 Guildford Road, Lightwater, Surrey, GU18 5SA, United Kingdom

## **Who this privacy policy applies to**

PayPerCustomer Ltd is a Lead Generation Company. This policy relates to users of PayPerCustomer Ltd. Processing of your data is required in order to run our company and to offer our Lead Generation Company services to our clients. This policy applies to individuals who have shared their data with Paypercustomer Ltd as either a customer, employee, supplier or in any other capacity, and to individuals whose data we have collected as part of providing our Lead Generation Company services to them.

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the GDPR. This can include:

- Names of Individuals
- Postal addresses
- Email Addresses
- Telephone numbers
- Personal information
- Financial information
- Employment and Education details
- Other information as required to provide our services and operate our company

## **What this policy applies to**

This section describes the lawful basis for processing data and applies to information about individuals that we collect, store, or process for all sources. This includes:

- The Information you provide when you contact us
- When you contact us in order to discuss using our services
- Information we collect about how you use the website
- Information that is given and stored as part of our ongoing relationship
- Information we collect as part of our Lead Generation Company service
- We do not routinely collect or process sensitive data, where this occurs we will take appropriate precautions with this data.

## **How your information will be used**

We will only use your personal data for the purposes for which we collected it and as you would reasonably expect your data to be processed and only where there is a lawful basis for such processing, for example:

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing</b>
To register you as a new customer	(a) Identity, (b) Contact	Performance of a contract with you
To process and deliver the services you request including managing payments, fees and charges, and to collect and recover money owed to us	(a) Identity, (b) Contact, (c) Financial, (d) Transaction, (e) Marketing and Communications	(a) Performance of a contract with you, (b) Necessary for our legitimate interests to recover debts owed to us
To manage our ongoing relationship with you which will include notifying you about changes to our terms, services, or privacy policy, to maintain our records	(a) Identity, (b) Contact, (c) Profile, (d) 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 services
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity, (b) Contact, (c) 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, (b) Necessary to comply with a legal obligation
To deliver relevant content and advertisements to you and measure and understand the effectiveness of our advertising	(a) Identity, (b) Contact, (c) Profile, (d) Usage, (e) Marketing and Communications, (f) Technical	Necessary for our legitimate interests to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy
To use data analytics to improve our website, services, marketing, customer relationships and experiences	(a) Technical, (b) Usage	Necessary for our legitimate interests to define types of customers for our services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity, (b) Contact, (c) Technical, (d) Usage, (e) Profile	Necessary for our legitimate interests to develop our services and grow our business
To operate our Lead Generation Company company and provide our services to our clients	(a) Identity, (b) Contact, (c) Financial, (d) Life style, (e) Professional, (f) other information as required	Necessary for our legitimate interests to develop our services and grow our business

In accordance with your preferences, we may also use your personal information to provide you with information about services, promotions and offers that may be of interest to you. We may use your personal information in order to ascertain the services, promotions and offers that are likely to be of particular interest to you. This document explains how you can change whether to receive this information. Please note that, even if you choose not to receive this information, we may still use your personal information to provide you with important services communications, including communications in relation to any purchases you make or services you use.

- Information that our clients provide to us when registering with our website (including email address, contact details, and any other details provided)
- Information that you provide when completing an online form
- Information that you provide to us when signing up to any distribution lists to receive correspondence from us
- Information relating to any use you make of our services, including any other transaction details (including your address, telephone number and financial details)

**Data we receive will be used for the purposes it was provided, including:**

- To respond to queries regarding the possible use of our services
- To carry out our obligations arising from any contracts entered into between our clients and us including the provision of services, and to respond to queries regarding those contracts
- To manage and administer the relationships between our clients and us
- To obtain feedback

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## **Scope of Agreement**

By submitting your personal data on this site or as required for us to provide services to you, you are affirming your agreement for such information to be used in accordance with this privacy policy. You will be able to change your preferences at any time by the methods described as prescribed in this document.

## **How to exercise your rights as an individual**

If we have collected, stored, or processed your data as part of running our business we will at all times respect your rights as an individual and ensure we meet our obligations professionally and courteously. We operate in line with EU GDPR (May 2018) data protection guidelines. We respect your rights and will respond to any request for access to personal information and requests to delete, rectify, transfer, data and to stop processing. We will also advise you on how to complain to the relevant authorities, namely the Information Commissioner's Office. Any requests or objections should be made in writing to the Data Controller or you can visit our website, call, or email us to contact us to change your preferences at anytime.

## **Opting out at a later date**

As a client where you give your consent for us to process your data, for example when you agree to us sending you marketing information or where you agree to us processing financial data, you can contact us to amend or withdraw your consent at anytime. You can also choose to object to processing and request deletion of your data. We respect all user rights as defined in GDPR. If you have any comments or wish to complain please contact us.

## **How we store and process your data**

Your data will be collected, stored and processed in the EU only. We do not transfer your data outside the EU. Your data will generally not be stored for more than 7 years after the end of our relationship to ensure we have records of service, payments, and other interactions we have with you.

In order to provide our services to you, we use recognised third parties to take payment, conduct credit reports and other checks, manage our company accounts and provide banking services. We will store transactions, payment and order data for up to 7 years or for as long as required by UK financial and company regulations. These third parties may operate outside the EU, if this is the case we will ensure precautions are in place to protect your data.

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 find out more about how the processing for the new purpose is compatible with the original purpose, please email us. If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may be legally obliged to disclose your personal information without your knowledge to the extent that we are required to do so by law; in connection with any ongoing or prospective legal proceedings; in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); to any person who we reasonably believe may

apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

## **Our obligations to our clients**

We are a data controller. In relation to the information that you provide to us, we are legally responsible for how that information is handled. We will comply with the GDPR (2018) in the way we use and share your personal data. Among other things, this means that we will only use your personal data:

- Fairly and lawfully
- As set out in the legislation and this policy
- To the extent necessary for these purposes
- We will take steps to ensure your data is accurate and rectify data as necessary

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights>

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.

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.

We try to respond to all legitimate requests within one month. Occasionally it may 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.

## **Our obligations to individuals and data subjects whose data we process**

We are the joint controller of your data and as such we are legally responsible for how that information is handled. We will comply with the GDPR (2018) as described above.

### **Third Parties**

We may share your personal data with the parties set out below for the purposes described in this document:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, credit scoring, banking, legal, fraud protection, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.
- Third parties as required to run our business and provide our services to our clients.
- IT systems including [but not limited to]: Google Adwords, Capsule CRM, Google Sheets, Xero, DocuSign, Unbounce.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

### **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 such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We will report any breaches or potential breaches to the appropriate authorities within 24 hours and to anyone affected by a breach within 72 hours. If you have any queries or concerns about your data usage, please contact us.

This website may include links to third-party websites, plug-ins and applications. 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.

## **Cookies**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

As well as your ability to accept or reject cookies, we also require your permission to store cookies on your machine, which is why when you visit our site, you are presented with the ability to accept our terms of use, including the storage of cookies on your machine. Should you not accept then you are free to leave our website, at any time.

## **Legitimate Interests**

We have completed a Legitimate Interest Balancing Assessment and as such we have determined that our processing is reasonable and the rights of any individual are not adversely affected. We take these rights seriously and will review this assessment regularly.

## **Contacting us, exercising your information rights and Complaints**

If you have any questions or comments about this Privacy Policy, wish to exercise your information rights in connection with the personal data you have shared with us or wish to complain, please contact: George Robinson at Paypercustomer Ltd. We will process SARs within 30 days, SAR responses are usually free but we reserve the right to charge for excessive or unfounded requests. We fully comply with Data Protection legislation and will assist in any investigation or request made by the appropriate authorities.

If you remain dissatisfied then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
[www.ico.org.uk](http://www.ico.org.uk)