



## Privacy Notice 2018/2019

<b>Company Name:</b>	CSSP ('the Company')
<b>Company Contact details:</b>	Mr Troy MANN, Data Controller for CSSP t/a Marinstar LTD and any representatives working for or on behalf of CSSP at the registered address: Devonshire House, 29-31 Elmfield Road, Bromley, London BR1 1LT
<b>Document DP5A</b>	Privacy Notice (when personal data is obtained from the data subject)
<b>Topic:</b>	Data protection
<b>Date:</b>	22.05.2018
<b>Version:</b>	CSSP_1

The Company is a Software business which provides Software Applications and associated Support to its clients. The Company must process personal data so that it can provide these services – in doing so, the Company acts as a data controller. The Company does not Process Sensitive Personal Data.

You may give your personal details to the Company directly, such as emails, or website links, or we may collect them from another source such as from the Software Applications directly. The Company must have a legal basis for processing your personal data. For the purposes of providing you with Support and/or Product enhancements and upgrades relating to the Software products you or your Company currently use, we will only use your personal data in accordance with the terms of the following statement.

### 1. Collection and use of personal data

#### a. Purpose of processing and legal basis

The Company will collect your personal data and will process your personal data for the purposes of providing you with support and upgrades of current products. The legal bases we rely upon to offer these services to you are:

1. *Contractual obligations* of the Company to supply Support to keep the software running correctly and ensure necessary upgrades are carried out as required.
2. *Processing* is necessary to enable continued efficient use of the supplied Software.
3. Consent of the individual for one or more specific purposes.

#### b. Legitimate interest

Where the Company has relied on a legitimate interest to process your personal data our legitimate interests is/are as follows:

- To Support and Upgrade currently used Software products, now and into the future

#### c. Recipient/s of data

The Company will not process your data with any third party.

#### d. Statutory/contractual requirement

Your personal data may be stored as part of a statutory and/or contractual requirement, and/or a requirement necessary to enter into a contract for Support and Maintenance of the Software used.



## 2. Overseas Transfers

The Company may transfer only the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing Support, Maintenance and Upgrades of Software products supplied. We will take steps to ensure adequate protections are in place to ensure the security of your information. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

## 3. Data retention

The Company will retain your personal data only for as long as is necessary. Different laws require us to keep different data for different periods of time.

Where a Support agreement is in place between the Company and yourself we will retain your Personal details for as long as that agreement remains current.

Where the Company has had a Support agreement with another Company that has ceased that agreement we will keep the Personal Details of people within that Company that have given Consent for a period of 12 months unless otherwise requested by yourself.

We must also keep financial records between CSSP and the Recipient of the software for as long as is legally required by HMRC and associated tax legislation.

Where the Company has obtained your consent to process your personal data, we will do so in line with our retention policy it: will be held for 12 months after support ceases or until otherwise requested by yourself.

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to the Company processing your personal data you have the right to withdraw that consent at any time by emailing [gdpnews@cssp.co.uk](mailto:gdpnews@cssp.co.uk) or contacting Mr Troy Mann at CSSP.

## 4. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: Mr Troy Mann at CSSP.

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.



Approval for this statement

This statement was approved by the Board of Directors on 24th May 2018

Name: Colin Rule  
Title: Managing Director  
Date: 24 May 2018