

# Privacy Policy

This Policy explains when and why we collect personal information. It explains how we use this data, the conditions under which we may disclose it to others and how we keep it secure.

Any questions regarding this Policy and our privacy practices should be sent by email to Ian Finlayson at [ian.finlayson@psi-advantage.com](mailto:ian.finlayson@psi-advantage.com)

or by post to Practical Solutions International Ltd (PSI), PO Box 5146, Spencers Wood, Reading, RG7 1YF.

Tel: +44 1189 888033

For the purposes of the Data Protection Act 1998 and the General Data Protection Regulations (GDPR), PSI acts as a Data Controller.

## **How do we collect information about you?**

We obtain information about you when you undertake contracts with PSI, meet at meetings/ conferences, exchange business cards, via Linked In etc.

## **What information is collected about you?**

The personal information we collect from you or a third party is the minimum required to provide you with the service requested, and we only pass your information to third parties for the fulfilment of the service requested and in the manner outlined in this policy. For access to the information we hold, you can contact us on the details above.

If you contact PSI through email or the contact form on the website, the content of the email will be stored.

## **How is your data used?**

- To maintain records of our customers and fulfil our contractual obligations
- To maintain records of our contacts; to get in touch about events/services of interest to you
- To provide you with additional services specifically requested by you

## **The legal basis for processing your data**

Under GDPR, the main grounds that we rely upon to process your data are:

- To comply with a contractual obligation.

- For the purpose of legitimate interests. This includes responding to requests or enquires from you, or to send information or services which you have expressed an interest in. You can ask us to change your preferences at any time - see the section entitled 'Managing your data and preferences' below.
- We may also be obliged by law to disclose your data to a regulatory body or law enforcement agency.

### **Who has access to your data?**

PSI will not sell your data to third parties. We will not pass your details to any third party for direct mailing purposes.

PSI Service Providers:

To provide our range of benefits and services, we use third parties to process and manage some of these benefits. In all cases, we provide only the necessary data to these third parties to enable them to perform their role. For example, when we use a payment processor to take payment for a membership or service, we don't need to pass them details of your gender, so we won't.

We use third parties to provide services to securely store the data for operational and back up purposes.

### **Managing your data and preferences**

We will contact you by email for information directly related to our contract with you. For any other information you can choose if you want us to contact you and what information you receive.

In addition, you have certain rights concerning your data that we hold:

Right to be informed

You have the right to ask questions about the data we hold. This Privacy Policy provides all the information about what data we collect, why we collect it and what we do with it.

Right of access

You have the right to ask us what data we hold about you. On receipt of a valid request, which may include validating your identity, we will provide all the data we hold about you within one calendar month. There may be a small charge for this.

Right of rectification

You have the right to ask us to correct any of your data which is incorrect or requires updating. We will do this within one calendar month of receipt of a valid request, which may include verifying your identity and we may request proof of the correct data.

## Right to erasure

You have the right to request that PSI erase your data. We will process such requests within one calendar month of receiving a valid request, which may include verifying your identity. There may be circumstances when we are unable to erase all data – either due to a legal obligation to retain your data, or because we are contractually obliged to provide you with a product or service. If this is the case, we will explain this in our response to the request.

## Right to restrict processing

You have the right to request that PSI restrict the processing of your data in some circumstances. This may be due to a dispute over the accuracy of the data or when you have exercised your right to object (below) and PSI are considering the request. Rights to restrict processing are therefore usually temporary in nature and will be assessed on receipt of a valid and authenticated request. It may not always be possible to restrict processing either due to a legal obligation to retain your data, or because we are contractually obliged to provide you with a product or service.

## Right to data portability

You have the right to request PSI to transfer the data held about you to another organisation. Although this concept works well between providers of similar services such as banks and building societies, PSI provides a unique service to their customers. However, we will consider any such request on receipt of a valid and authenticated request and will provide you with a written response.

## Right to object

You can change your contact preferences either by email or as noted above. If you consider that some of the data held is no longer required for legitimate purposes, we will consider this within one calendar month of receipt of a valid request, which may include verifying your identity.

## **How long we hold your data for**

We will only hold your data for as long as needed to for the purpose we have collected it.

Contact list data is kept indefinitely or until you request removal from it.

## **Links to other websites**

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy

policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

### **Transferring your data outside of Europe**

As part of the services offered to you by PSI, the information which you provide to us may be transferred to countries outside the European Union ("EU"). By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy. Currently all third parties that we share data with are covered by European data regulations or Privacy Shield in the US.

### **Complaints**

We operate our own internal complaints policy and if you have any concerns about the way in which we collect or handle data please contact us.

Additionally, you have the right to lodge a complaint with the Supervisory Authority:

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

Tel. 0303 123 1113