

# SWUSH LTD PRIVACY NOTICE

This privacy notice provides you with details of how we collect and process your personal data through this site when you use our contact ('Get in touch') form.

## WHO WE ARE

Swush Ltd is the controller and responsible for your personal data (collectively referred to as 'Swush', 'we', 'us', or 'our' in this privacy notice).

## OUR NAME AND CONTACT DETAILS

Registered address: 10-12 East Parade, Leeds. West Yorkshire. LS1 2BH.

Our data protection officer's email address: [hello@swush.co.uk](mailto:hello@swush.co.uk)

## PERSONAL DATA COLLECTED

The following personal data is collected directly from yourself when you use our contact form:

- Name
- Email address
- Any other information you may provide us.

We may collect certain data automatically when you visit our website:

- Technical data such as your IP address, details about your browser, length of visit to pages on our website, page views and navigation paths, and time zone settings.

You can manage cookie settings by clicking the 'C' in the bottom-left-hand corner of the website. Please see our Cookie Notice for further details.

This website is not intended for children, and we do not knowingly collect data relating to children.

## USE OF YOUR PERSONAL DATA

We use your personal data to:

- Reply to any enquiries you make using our contact form
- Keep records of our communications with you
- Manage and protect our business
- Comply with relevant legal
- Monitor and analyse the use of our website
- Administer our website

Your personal data is not used for automated decision-making or automated profiling.

## WHERE WE STORE YOUR DATA

Your personal data is stored in the United Kingdom and Europe.

## DATA RETENTION

Your personal data is retained for one (1) year and as long as reasonably necessary thereafter to fulfil our legal requirements.

## LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

We collect, store, and use your personal data to respond to enquiries you have made via our website and to provide you with information and to keep relevant records related to your request on the basis of our legitimate interest.

## WHO WE SHARE YOUR PERSONAL DATA WITH

- 1) Where necessary, service providers who provide IT and system administration services
- 2) In certain circumstances be provided to other third parties such as HMRC or Companies House, or other regulatory or law enforcement bodies, but only in compliance with the law and where strictly necessary.

## AUTOMATED DECISION-MAKING AND PROFILING

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, including profiling, unless you have given us your consent to do so, or it is necessary for entering into or the performance of a contract.

## YOUR RIGHTS

You have qualified data protection rights:

- Access - you have the right to ask us for copies of your personal data. This right always applies. There are some exemptions, which means you may not always receive all the personal data we process.
- Rectification - you have the right to ask us to rectify any of your personal data that you think is inaccurate or incomplete. This right always applies.
- Erasure - you have the right to ask us to erase your personal data where it is no longer required for purpose for which it was collected, or you withdraw your prior consent to us processing it and we have no other legal ground for processing it, or it is being processed unlawfully, or when it must be erased to comply with a legal obligation, or it is being used for direct marketing purposes where we have no legitimate grounds for us doing so.
- Restriction - you have the right to ask us to restrict the processing of your personal data where it is inaccurate (allowing us to verify the accuracy), or it is being processed unlawfully (and you want us to stop processing rather than

erasing it), or where you have objected to us processing it while we're verifying whether we have legitimate grounds for processing, or it is no longer required for purpose for which it was collected and you want us to keep it for the establishment, exercise or defence of legal claims.

- Portability - this only applies to personal data you have given us. You have the right to ask us to transfer the information you provided us from one organisation to another or give it to you. This only applies if we are processing personal data based on your consent or as part of a contract, or in talks with you about entering into a contract and the processing is automated.
- Objection - you have the right to object to processing your personal data if we are using legitimate interests as our lawful basis for processing, or it is being used for direct marketing.
- Withdrawing consent - you can withdraw your consent that you have previously given to us for one or more specified purposes to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. It may mean we are not able to provide certain products or services to you and we will advise you if this is the case.
- You have the right to complain to a Supervisory Authority, in the UK that is the Information Commissioner's Office.

### BREACHES

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### DEALING WITH YOUR REQUESTS

We will deal with your requests as soon as possible but may take up to 1 month (possibly extended to 3 months where the law permits). Normally there is no charge, however we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive or we could 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 your 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.

### NOTE

This notice does not form part of any contract of employment or other contract to provide services.

### SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, destroyed, or accessed without

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authorisation. While no data transmission or storage can be guaranteed to be secure, we implement a range of commercially reasonable physical, technical, and procedural measures to help protect personal data. These measures include policies, confidentiality agreements with third parties, secure development practices, security due diligence of service providers, products, services that may be used.

We have also put in place procedures to deal with any suspected personal data breaches and will notify you and any applicable regulator of a breach where we are legally required to do so.

### CHANGES TO THIS PRIVACY NOTICE

We may update this notice from time to time and any changes we make to our privacy notice in the future will be posted on our intranet and, where appropriate, notified to you by email. Please check our website frequently to see any updates or changes to our notice.

This Privacy Notice was updated on 26/01/2024.