

# PRIVACY POLICY

## Introduction

This privacy policy sets out how Declaration Software Ltd uses and protects your personal data. This privacy policy is provided in a layered format so you can click through to the specific areas set out below.

### 1. Important information and who we are

#### Privacy policy

This privacy policy gives you information about how Declaration Software Ltd collects and uses your personal data through your use of this website, including any data you may provide when you make inquiries with us or purchase a product or service.

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

#### Controller

Declaration Software Ltd is the controller and responsible for your personal data (collectively referred to as "DSL" "we", "us" or "our" in this privacy policy).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy.] If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the information set out in the contact details below.

### 2. The types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, any previous names, username or similar identifier.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and

platform, device ID and other technology on the devices you use to access this website.

- **Usage Data** includes [information about how you interact with and use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

### 3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Your interactions with us.** You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - request marketing to be sent to you; or
  - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties as set out below:
  - Technical Data is collected from the following parties:
    - analytics providers such as Google based outside the UK;
    - advertising networks; and
    - search information providers.
  - Contact, Financial and Transaction Data is collected from providers of technical, payment and delivery services.
  - Identity and Contact Data is collected from data brokers or aggregators.
  - Identity and Contact Data is collected from publicly available sources such as Companies House and the Electoral Register based inside the UK.

### 4. How we use your personal data

## Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

## Purposes for which we will use your personal data

### How we use your personal data

We will only use your personal data for the purpose for which we collected it which includes the following:

- To register you as a new customer which is necessary in the performance of a contract with you.
- To process and deliver our services which is necessary in the performance of a contract with you and for our legitimate interest (for example, to recover debts due to us).
- To manage your relationship with us which is necessary in the performance of a contract with you, to comply with a legal obligation and for our legitimate interest (for example, to keep our records updated and to study how customers use our products/services).
- To enable you to participate in competitions, promotions, special offers or complete a survey which is necessary in the performance of a contract with you and for our legitimate interest (for example, to study how customers use our products/services, to develop them and grow our business).
- To improve our website, products/services, marketing or customer relationships which is necessary for our legitimate interest (for example, to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).
- To recommend products or services which may be of interest to you which are necessary for our legitimate interest (to develop our products / services and grow our business).

If we need to use your personal data for an unrelated purpose to which it was collected, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with this privacy policy and the data protection legislation, where this is required or permitted by law.

### **Direct marketing**

We will only send you direct marketing communications by email or text if we have your consent. You have the right to withdraw that consent at any time by contacting us.

### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

### **Opting out of marketing**

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

### **Cookies**

For more information about the cookies we use and how to change your cookie preferences, please see <https://powersyncpro.com/cookie-policy>

## **5. Disclosures of your personal data**

Subject to what we say below, we will not pass on your personal details to any third party, including site sponsors or advertisers, without your consent. We may provide aggregate statistics about our users, sales, traffic patterns and related site information to our third-party partners (if any), but these statistics will not contain any information about you from which you could be identified.

If you enter any competitions on this web site, it may be necessary for us to provide your personal data to the promoters of the competition or to others that are involved in the organisation of the competition or the prize-giving.

## **6. International transfers**

We share your personal data within the Nero Blanco Group (which currently includes Nero Blanco IT Limited) whose website can be found at <https://neroblanco.co.uk/>. This will involve transferring your data outside the UK.

Many of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

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

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

## **8. Data retention**

### **How long will you use my personal data for?**

We will not hold onto your personal data for longer than is necessary for the purpose for which it was collected including for the purposes of satisfying any legal, accounting, reporting, or support requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and

whether we can achieve those purposes through other means and the applicable legal requirements.

By law we have to keep basic information about our customers (including contact, identity and financial information and transaction data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data. You can exercise this right at any time by contacting the DPO (see below).

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

We will take all reasonable steps to destroy or erase from our system, all data which is no longer required.

## 9. Your legal rights

You have a number of rights under data protection laws in relation to your personal data.

You have 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.

If you wish to exercise any of the rights set out above, please contact the DPO (see below).

### **No fee usually required**

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 could refuse to comply with your request in these circumstances.

### **What we may need from you**

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.

### **Time limit to respond**

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

### **10. Contact details**

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact our DPO in the following ways:

- Email address: [twan@powersyncpro.com](mailto:twan@powersyncpro.com)
- Postal address: Room 73, Wrest House Wrest Park, Silsoe, Bedford, England, MK45 4HR

### **11. Complaints**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **12. Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review. This version was last updated on 21/08/2024. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

### **13. Third-party links**

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 policy of every website you visit.