

# PRIVACY AND COOKIE POLICY

Version 0.0

25<sup>th</sup> April 2018

## **VERSION HISTORY**

Version	Author	Revision Date	Approved By	Approval Date	Comments
0.0	Stephen Grant	25/04/2018			Initial Draft

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#### 1. Introduction

Mouse Click Systems Ltd. (unless stated otherwise – "we," or "our") are committed to protecting and respecting your data privacy and data protection when you communicate either online or offline with us through our various websites, offline programmes and events.

At Mouse Click Systems Ltd. we respect your right to privacy. This Policy explains when and why we collect personal information about people who visit our website, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

#### 1.1 What is This Guide For?

This policy (together with our terms of use and any other documents referred to below) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Mouse Click Systems Ltd. is committed to safeguarding your personal information. Whenever you provide such information, we are legally obliged to use your information in line with the General Data Protection Regulations (GDPR).

### 1.2 Who is Responsible for Data Mouse Click Systems Ltd. Collects?

Mouse Click Systems Ltd. is a Data Controller under the GDPR. Mouse Click Systems Ltd.'s Data Protection Officer is **Stephen Grant** who can be contacted using details in section 12, Contacting Us.

### 2. Information We May Collect from You

Mouse Click Systems Ltd. collects data from individuals to help us plan, organise and run the day-to-day operations of the group (e.g. co-ordinating rehearsals or events) and to promote and market the group's activities (e.g. marketing mailing lists and photography/video capture).

#### 2.1 Types of Data Collected

### 2.1.1 Contact Data – For Administering Contact Details

Information you submit via the Contact Form on the Mouse Click Systems Ltd. website is used for the purposes of servicing your requests for information which prompted the use of the Contact Form. Name

- Address
- Email address
- Phone number
- Age/gender

This data will be used by committee members to manage your membership with Mouse Click Systems Ltd. and to organise and run our activities.

If you give us your consent to do so, we may also use your contact details to send you marketing/promotional communications from us.

Any marketing/promotional communication we send you will include a clear option to withdraw your consent (e.g. to 'opt out' of future emails) and you can also withdraw consent at any point by contacting the Data Protection Officer.

#### 2.1.2 Website Visitors – For Running and Improving Our Website

We use cookie technology when a person visits our website to collect and analyse anonymised data on how many people have visited, what pages they have looked at and other statistical information.

We use a pop-up banner to let users know about this on their first visit, and they can at any time disable cookies in their browser if they do not wish their (anonymised) data to be tracked.

You can find out more about cookies in our cookie policy, or at http://www.allaboutcookies.org.

### 2.2 Profiling

We do not analyse your personal information to create a profile of your interest so that we can contact you with information relevant to you.

### 2.3 How Can You Update Your Data?

The accuracy of your information is important to us. You can contact us at any time using the contact details in section 12, Contacting Us, to update or correct the data we hold on you.

#### 2.4 Withdrawal of Consent

If you have provided us with your consent to process your data for the purposes of an enquiry or job application, you have the right to withdraw this at any time. In order to do so, please contact us using the contact information in section 12, Contacting Us.

### 2.5 How long we will hold your data?

We are required under UK tax law to keep your basic personal data (name, address, contact details) for a minimum of 6 years after which time it will be destroyed. Your information we use for marketing purposes will be kept with us until you notify us that you no longer wish to receive this information. More information on our retention schedule can be found at: <a href="https://www.mouseclicksystems.co.uk/dataretention">www.mouseclicksystems.co.uk/dataretention</a>

### 3. Disclosure of Information

Your personal data will be treated as strictly confidential and will only be shared with other members of Mouse Click Systems Ltd. in order to carry out a service to other Mouse Click Systems Ltd. members or for purposes connected with Mouse Click Systems Ltd. We will not sell, distribute or lease your personal information to third parties outside of Mouse Click Systems Ltd., except as set out below.

We may share your data with governmental bodies, regulators, law enforcement agencies, courts/tribunals and insurers where we are required to do so:

- to comply with our legal obligations;
- to exercise our legal rights (for example in court cases);
- for the prevention, detection, investigation of crime or prosecution of offenders; and
- for the protection of our members and customers.

You may request details of personal information which we hold about you under the data protection laws. We will provide this free of charge. If you would like a copy of the information held on you please contact us using the address in section 12, Contacting Us.

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible at the above address. We will promptly correct any information found to be incorrect.

### 4. Children's Privacy

Our Services do not address anyone under the age of 16 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 16. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

Once a child is over 16 years old, parental consent to use their data will no longer be sufficient. We will only continue to hold/use the data if the child *themselves* also gives their consent.

### 5. Your Rights and Your Personal Data

Under the GDPR, you have the following rights over your data and its use:

- The right to be informed about what data we are collecting on you and how we will use it
- The right of access you can ask to see the data we hold on you
- The right to rectification you can ask that we update or correct your data
- The right to object you can ask that we stop using your data for a particular purpose
- The right to erasure you can ask us to delete the data we hold on you
- The right to restrict processing you can ask that we temporarily stop using your data while the reason for its use or its accuracy are investigated
- Though unlikely to apply to the data we hold and process on you, you also have rights related to portability and automated decision making (including profiling)

All requests related to your rights should be made to the Data Protection Officer using the address in section 12, Contacting Us. We will respond within one month.

You can find out more about your rights on the Information Commission's Office website, again using the address in section 12, Contacting Us.

### 6. Security of Your Personal Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside United Kingdom and choose to provide information to us, please note that we transfer the data, including Personal Data, to United Kingdom and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Mouse Click Systems Ltd. will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

#### 6.1 What You Can Do to Help Protect Your Data

Mouse Click Systems Ltd. will never ask you to confirm any bank account or credit card details via email. If you receive an email claiming to be from Mouse Click Systems Ltd. asking you to do so, please ignore it and do not respond.

If you are using a computing device in a public location, we recommend that you always log out and close the website browser when you complete an online session.

In addition, we recommend that you take the following security measures to enhance your online safety both in relation to Mouse Click Systems Ltd. and more generally:

- Keep your account passwords private. Remember, anybody who knows your password may access your account.
- When creating a password, use at least 8 characters. A combination of letters and numbers is best. Do not use dictionary words, your name, email address, or other personal data that can be easily obtained. We also recommend that you frequently change your password. You can do this accessing your account, clicking 'your account', clicking 'your data' and selecting 'change password'.
- Avoid using the same password for multiple online accounts.

### 7. Links to Other Websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy policy. You should exercise caution and look at the privacy policy applicable to the website in question.

### 8. About Cookies

A cookie is a small piece of data placed on your hard drive in order to assist us in providing customised services. Cookies cannot pass on computer viruses, retrieve other data from your computer's hard drive or capture your email address. Cookies can be used to save users time on the site, by securely storing a user's ID and password, personalise web pages and identify visited parts of a site and keep track of user's selections. 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.

You can find more information about cookies at www.allaboutcookies.org.

See below for details on what information is collected by cookies and how we use that information.

### 9. What Types of Cookies are Used?

The following types of cookies are used by Mouse Click Systems Ltd. websites:

### 9.1 Necessary Cookies

These are cookies that are strictly necessary for the operation of a website. Without these cookies, this website won't work properly. Accordingly, we are not asking you for your specific consent for those cookies. For all other cookies your informed consent is required.

#### 9.1.1 Performance Cookies

These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

#### 9.2 Session Cookies

Session cookies are temporary cookie files which are erased when you close your browser. When you restart your browser and go back to the site that created that cookie, the website will treat you as a new visitor.

### 9.3 Functional or Persistent Cookies

These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports or traffic news by storing in a cookie the region in which you are currently located.

These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

### 9.4 Third Party Cookies

These cookies allow third parties to track the success of their application or customise the application for you. Due to how cookies work we cannot access these cookies, nor can the third parties access the data in cookies used on our site.

For example, if you choose to 'share' content through Twitter or other social networks you might be sent cookies from these websites. We don't control the setting of these cookies, so please check those websites for more information about their cookies and how to manage them.

### 9.5 Google Analytics

Mouse Click Systems Ltd. uses Google Analytics, a web analytics service provided by Google. Google Analytics collects first party cookies, which are text files placed on your computer to collect standard 25<sup>th</sup> April 2018 Privacy and Cookie Policy 14

internet log information and visitor behaviour. This information is sent to Google and is used to evaluate how our website is being used. This enables Mouse Click Systems Ltd. to compile statistical reports. A full list of cookies used by Google Analytics and explanations on how these work are available on the Google code website.

Mouse Click Systems Ltd. does not collect (nor allow any third party to collect) personally identifiable information of visitors to our site. We will not associate any data gathered with any personally identifying information. We will not link or seek to link an IP address with the identity of a computer user. In short, Google Analytics doesn't identify who you are, but it does track your movements on our websites.

### **10.** How to Disable Cookies

You can stop cookies being downloaded on to your computer by selecting the appropriate settings on your browser. However please note that if you do this you may not be able to use the full functionality of this website.

There is more information about cookies, including how to delete them on the website www.aboutcookies.org. You may also opt out of being tracked by Google Analytics.

### 11. Changes to this Privacy and Cookie Policy

We reserve the right to make changes to this Privacy and Cookie Policy at any time. Any changes will be posted in this Privacy Policy and material changes will be prominently notified on the respective website or application this Privacy Policy applies to or will be otherwise communicated to you prior to the change becoming effective. We encourage you to regularly review this Privacy Policy to make sure you are aware of any changes and how your information may be used.

### 11.1 Updates

This Privacy and Cookie Policy was last updated on 25<sup>th</sup> April 2018

### 12. Contacting Us

If you any questions or comments about this Privacy Policy, please contact us:

Mouse Click Systems Ltd Brunel House 340 Firecrest Court Centre Park Warrington Cheshire WA1 1RG

Email: dataprotection@mouseclicksystems.co.uk

Website: <a href="http://www.mouseclicksystems.co.uk/contact-us">http://www.mouseclicksystems.co.uk/contact-us</a>

You can contact the Information Commissioners Office:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Telephone: 0303 123 1113

Website: <a href="https://ico.org.uk/global/contact-us/email/">https://ico.org.uk/global/contact-us/email/</a>