

# Data Privacy Policy - February 2022

## 1.0 Overview

Your privacy is important to Digital Modus. In this notice we have collated all the things you need to know about how we collect, store and treat your data. We have updated our privacy notice and policies to include additional information required under applicable data protection regulations – including the European Union’s General Data Protection Regulation (GDPR) – such as the following:

- Why we process personal data
- Legal grounds for processing personal data
- European Union user rights under the GDPR and how to exercise them
- Contact information for the Digital Modus data controller

“Personal data” is information relating to an identified or identifiable natural person.

## 2.0 What We Need

Our Personal Data Protection Policy governs the use and storage of your data. Digital Modus is a Controller of the personal data you, the “data subject”, provide us.

We collect the following types of personal data from you:

- Some tracking info about your visit to our website.
- Google Analytics tracking information.
- Information that you provide to us requesting services or information from us.
- Personal information for the purposes of recruitment (CVs, cover letters, contact information).

We do not collect “personal sensitive information”.

## 3.0 How We Collect Information From You

We collect and retain data in a number of ways. You might submit personal, business or contact info through written correspondence (email or mail), phone calls, web forms, shared documents, face-to-face meetings, video conferencing, social media conversations and other means. We also use automated ways of collecting information including use of cookies and Google Analytics tracking codes.

## 4.0 Why We Need It

We need your personal data for administrative and business purposes in relation to delivering our products and services to you.

## 5.0 What We Do With It

Your personal data is processed in the UK. Hosting and storage of your data takes place in Google Data Centers located [here](#). We only use your personal information as submitted by you and only for the purposes requested by you upon submission of that information. No third party providers have access to your data, unless specifically required by law.

## 6.0 Information Security

We work hard to protect Digital Modus and our users from unauthorised access to or unauthorised alteration, disclosure or destruction of information that we hold. In particular:

- We review our information collection, storage and processing practises, including physical security measures, to guard against unauthorised access to systems.
- We restrict access to personal information to Digital Modus employees, contractors and agents who need to know that information in order to process it for us and who are subject to strict contractual confidentiality obligations. They may be disciplined or their contract terminated if they fail to meet these obligations.

## 7.0 How Long We Keep It

We will retain your personal data as long as there is a lawful basis for doing so. After this period, your personal data will be irreversibly destroyed. Any personal data held

by us for marketing and service update notifications will be kept by us until such time that you notify us that you no longer wish to receive this information.

## 8.0 What Your Rights Are

You have the right under the General Data Protection Regulation to request from Digital Modus access to and rectification or erasure of your personal data, data portability, restriction of processing of your personal data, the right to object to processing of your personal data.

## 9.0 Cookies

Cookies help us to understand how many unique visitors we have had to our website, and whether you have been here before or not, and indeed where you have come from on the internet. Information from cookies to help develop our marketing and web strategies.

These files do not allow us to personally identify anyone, and we cannot track any of your web activities not related to Digital Modus's websites. Cookies also cannot be used as code to deliver malware or viruses to your computer. We will only use visitor information to help improve our services and sites.

If you do not feel comfortable having sites use cookies to gather information, you can usually disable cookie collection in your browser settings. Disabling cookies can affect how some websites appear and some of their functionality might not be fully available.

## 10.0 Privacy Policy Updates

We may update this Privacy Policy from time to time as we introduce new products and services, as we improve our current offerings and as technologies and laws change. Any changes will become effective upon our posting of the revised Privacy Policy.

## 11.0 How to Make a Complaint

In the event that you wish to complain about how we have handled your personal data, please contact Data Protection Officer at [compliance@digitalmodus.com](mailto:compliance@digitalmodus.com) or in writing at:

DPO  
Digital Modus Ltd  
Cranleys  
Winton House, Winton Square  
BASINGSTOKE  
Hampshire  
RG21 8EN

Our DPO will then look into your complaint and work with you to resolve the matter. If you still feel that your personal data has not been handled appropriately according to the law, you can contact the Information Commissioner’s Office and file a complaint with them.

## Document Information

### Document Control

Version	Date	Author	Comments
0.1	1st February 2022	Nick Howes	Initial Draft
0.2	7th February 2022	Nick Howes	Changes following HR Consulting review
x.x	31st January 2023	TBD	Annual Review

### Distribution List

Name	Role
Staff	All Staff employed by Digital Modus must-read.
Contractors	All people involved on behalf of a subcontractor contracting with Digital Modus must-read.
Suppliers	Shared with Suppliers as part of Digital Modus supplier onboarding.

Customers	Shared with all Customers on request.
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