



# **Privacy & GDPR Policy**

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## 1. Introduction

Accelerate is committed to respecting your privacy and complying with all applicable data protection and privacy laws. This Privacy Policy explains how we collect, use, and protect your information when you visit our websites, attend our events, download our content, watch our webinars, apply for a job, or when you use our products and services.

For the purpose of applicable Data Protection Legislation, the data controller responsible for certain personal data shared when using our services is:

**Legal Entity:** Accelerate Limited

**Email address:** data@accelerate.com

**Postal address:** 19-23 King Street, First Floor Suite B, Manchester, M2 6AN

Users can visit our websites without disclosing any personally identifiable information (although please note that we may use cookies and collect other non-personally identifiable information about your browsing activity – please see our Website Privacy Policy & Website Cookie Policy for more details).

Where users do submit personal information for example by ordering products, services, or completing a web form Accelerate will use your personal information as set out in this policy.

## 2. Purpose

This policy aims to explain how we collect and process personal data through your use of our services, including any data you may provide through when you purchase our products and services, or otherwise through your use of the services.

The services are not intended for use by children, although you acknowledge that we will collect and process data relating to children (and anyone else) if they use the services.

It is important that you read this policy together with any other privacy notice or fair processing notice we may provide on occasions when we are collecting or processing personal data about you, so that you are aware of how and why we are using your data.

This Privacy and GDPR Policy supplements the other notices and is not intended to override them.



### 3. Personal Data Collection

Accelerate endeavours to collect and use your personal information only with your knowledge and/or where required or permitted by applicable law, your consent and typically when you order and subsequently use products and services, make product or customer enquiries, register for information or other services, request product information, submit a job application or when you respond to communications from us.

We may also collect your information if you request a quote from us via a website form or via email, in which case it shall be within our legitimate interests to contact you (subject to any preferences expressed by you). The type of personal information we may collect could include, for example:

**Identity:** Title, First Name, Last Name, Username, Business Name, Job Title.

**Contact:** Postal address, billing address, email address, telephone number.

**Technical:** IP address, browser type and version, time zone and location, operating system, platform, type of device.

**Transaction Data:** Payments to and from you, and other details of products and services you have purchased from us.

**Marketing & Communications:** Includes your preferences in receiving marketing from us and your communication preferences.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences (except for employees, who agree to this data being collected prior to commencing employment with Accelerate).

We may receive data about you from various third parties and public sources as set out below:

- Analytics providers such as Google based outside the EU.
- Advertising networks such as Google, Bing, Facebook, Twitter based outside the EU.
- Usage Data from communications providers such as Zoom & Amazon (AWS) based inside and outside the EU.
- Search information providers such as Google or MSN based outside the EU.
- Contact and Transaction Data from providers of technical, payment and delivery services such as Amazon (AWS) based outside the EU.



- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

If you choose to provide us with personal information it will be used in support of the intended purposes stated at the time at which it was collected, and where appropriate, subject to any preferences indicated by you.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

## 4. Non-personal Identifying Information

We may also collect non-personally identifying information about your visit to our websites based on your browsing activities. This information may include the pages you browse, and products and services viewed or ordered for example. This helps us to better manage and develop our sites, to provide you with a more enjoyable, customised service and experience in the future.

## 5. How we use your information

Accelerate will only use your personal data when the law allows us to. We may use your information for a number of purposes which include: processing orders and managing and administering your account; delivering services, products or information requested by you; responding to support tickets or account enquiries; administering debt recovery; verifying your identity when required.

If you are business customer or prospective business customer, we may store and use your information to contact you for sales and marketing purposes (relying on the soft opt in under applicable legislation) unless you specifically ask not to be contacted for such purposes. If you have attended one of our events or webinars we may contact you by email or telephone to ask for your feedback on the event you attended.

To update your marketing preferences or to unsubscribe please email [data@accelerate.com](mailto:data@accelerate.com) and quote your full name, email address, and/or account number and tell us what you want us to do.



## 6. Purposes for which we use your personal data

Purpose	Type	Lawful basis
<p>To manage our relationship with you, which may include:</p> <p>(a) Notifying you about changes to our Policies</p> <p>(b) Communicating with you if you contact us</p>	<p>Identity</p> <p>Contact</p> <p>Profile</p> <p>Marketing &amp; Communications</p>	<p>(a) Performance of a contract</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests, to keep our records updated</p>
<p>To administer and protect our business and services.</p>	<p>Identity</p> <p>Contact</p> <p>Technical</p>	<p>Necessary to protect our legitimate interests (running our business, provision of administration and managed services, to prevent fraud, to collect monies, and in the context of a business reorganisation or restructuring exercise.</p>
<p>To deliver relevant content and advertisements to you and measure the effectiveness of what we serve to you</p>	<p>Identity</p> <p>Contact</p> <p>Marketing &amp; Communications</p> <p>Technical</p>	<p>Necessary for our legitimate interests (to monitor how customers engage with our content and services, to grow our business and inform sales &amp; marketing strategy.)</p>



<p>To use data analytics to improve services, marketing, customer relationships, and customer experiences.</p>	<p>Technical</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep services relevant, to develop our business, and to inform sales &amp; marketing strategy.)</p>
<p>To make suggestions and recommendations to you about products or services that may be of interest to you.</p>	<p>Identity Contact Technical</p>	<p>Necessary for our legitimate interests (to develop our products &amp; services, and grow our business.)</p>

## 7. Disclosure of your personal data

We may only disclose information about you and contact details to (a) companies within the Group for the purposes and subject to the terms of this Privacy Policy Statement; (b) in the event that we undergo re-organisation or are sold to a third party, in which case you agree that any personal information we hold about you may be transferred to that reorganised entity or third party for the purposes and subject to the terms of this Privacy Policy Statement.

Accelerate does not sell or pass your personal information to third parties (other than as set out in this paragraph) unless you have given us permission, or unless it is strictly necessary to deliver the products and services ordered or used by you. Accelerate may also be obliged to disclose your personal information to meet any legal or regulatory requirements or obligations in accordance with applicable law or in response to a subject access request.

When you buy a product or service, we may make a search with Credit Reference Agencies to assess your credit worthiness. The Credit Reference Agency may make a record of that search. For the purposes of credit referencing, fraud prevention and money laundering regulations we may also share your account information and trade payment performance



with other carefully selected third parties such as credit reference agencies. We may also have to disclose some limited details to third party service providers, suppliers of software for audit reasons.

## 8. How long do we retain your information?

To ensure we meet our legal data protection and privacy obligations, we hold on to your information for as long as we need it for the purpose(s) you provided it in the first place. In most cases, this means we will keep your information for as long as you continue to use our services, and for a reasonable period of time afterwards. After that we will delete it, other than where we can lawfully keep any data for audit or legal reasons.

By law we must keep basic information about our customers (including Contact, Identity, Transaction Data) for six years after they cease being customers. For all other data, details of retention periods for different aspects of your personal data are available in our retention policy which you can request by contacting us.

We will keep data on our prospect database for a reasonable period from receipt, subject to your right to unsubscribe or be forgotten at any time. The reasonable period considers whether you have had contact with us or otherwise engaged with us during that time. Engaged means you are communicating with us or clicking through from our marketing communications.

For job applicants, if your application for employment is unsuccessful, Accelerate will hold your data on file for 12 months after the end of the recruitment process for legal/audit reasons. At the end of this period, and if you have not engaged in contact with us during that time, your data will be deleted or destroyed.

## 9. Access to your information

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.





- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

You can write to us at any time to obtain details of the personal information we may hold about you or you may ask us to modify, update or delete such information.



To make a request contact: [data@accelerate.co.uk](mailto:data@accelerate.co.uk)

Please quote your name and email address together with your mobile and/or account name (if relevant). It is helpful if requestors also provide details of what information they want a copy of. Accelerate will take reasonable steps to confirm your identity before providing you with any personal information we may hold. We attempt to respond to all legitimate requests within one month, but occasionally it may take us longer if your request is complex. In this case we will notify you.

## 10. Information Security

All information you provide to us is stored on our secure servers. We use industry standard security and firewalls on our servers. Where we have given you (or where you have chosen) a password which enables you to access certain services, you are responsible for keeping that password confidential. We ask you not to share a password with anyone.

We maintain physical, electronic, and procedural safeguards in connection with the collection, storage, and disclosure of your information.

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 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.

Please be aware that communications over the Internet, such as emails, are not secure unless they have been encrypted. Your communications may route through several countries before being delivered - this is the nature of the Internet. Accelerate cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.



## 11. Destruction & Disposal

Upon expiry of our retention periods, and subject to any legislative requirements, Accelerate will delete electronic files and confidentially destroy any paper files by way of crosscut shredding. All cloud-based storage that is no longer in use will be audited and sanitised.

Users must return all Accelerate assets in their possession upon termination of their employment, contract, or agreement. It is not permitted to pass or swap any Accelerate equipment or accessories between users. Computer storage media such as laptops will not be redistributed, sold, or donated without prior sanitisation to clear all data. The sanitisation method involves Multi-Pass Pattern Wiping to clear the hard disk drive. Where equipment is at end of life (EoL) we undertake secure disposal by means of disintegration.

In cases where a user uses their own personal equipment, the BYOD procedures should be followed to ensure that all relevant information is transferred to the company, and securely erased from the equipment. This process is managed via Hexnode MDM, which also controls BYOD access and monitoring. For more information, please refer to our BYOD Policy.

Confidential information must not be stored in or on any removable media. This includes USB flash drives, external hard disk drives, CDs/DVDs. Employees, contractors, and partners may only use company-approved cloud storage, protected by Accelerate's documented security and encryption protocols.

## 12. The Policy in Practice

Accelerate reserves the right to amend this Privacy & GDPR Policy at any time, and in response to changes in applicable legislation. If at any point we decide to use personal information in a manner different from that stated at the time it was collected, we will tell you. You will have a choice as to whether you agree.

Clients should note that a specific/dedicated DPIA may form part of our contract with you.

If you have an enquiry about our privacy policy or practices, please contact us at [data@accelerate.com](mailto:data@accelerate.com)



You can also contact the ICO if you are unhappy with how we have used your data. We would however appreciate the opportunity to deal with your concerns before you approach the ICO, so please contact us in the first instance.

**The ICO's address:**

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

Helpline number: 0303 123 1113

ICO website: [www.ico.org.uk](http://www.ico.org.uk)

### **13. Policy Review**

We review our policies regularly and any changes will be posted on this page. This Privacy & GDPR Policy was last reviewed and updated in May 2023.



### Version Control

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Public

