

## **GDPR – Privacy Notice**

### **Purpose of this privacy notice**

Primo Milestone Limited (Milestone), in its capacity as project management software, training, and consulting services provider, potentially uses, stores and transfers personal data obtained from you. The scope of the data we obtain from you is limited and is generally data we obtain directly from you or your colleagues, but it is important that you read this privacy notice together with any other privacy notice we may provide on specific occasions. This privacy notice supplements the other notices.

We are updating this privacy notice to meet standards of the new European data protection law, known as the General Data Protection Regulation (GDPR) (coming into effect on 25 May 2018). We want you to be fully aware of what data we collect and how and why we collect it, understand that we do not misuse it for unrelated purposes, and give you some additional information about our keeping your data safe.

We wish to maintain an open and transparent approach in relation to the protection of personal information. If you have any questions about this privacy notice or our collection and processing of your data, or wish to view or amend the information we hold about you, please do not hesitate to contact [info@milestoneuk.com](mailto:info@milestoneuk.com)

### **The data we collect about you and how we collect it**

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

The types of personal data we collect, use, store and transfer, is limited to the data which you or your colleagues provide us through direct interactions. This can be through your use of our website (including any data you may provide when you register for training courses, seminars or webinars), or through the course of our day-to-day dealings with you related to Milestone's activities (including any data you may provide as part of a service provider / customer relationship whether under non-binding discussions or commercial contracts). This data can include:

- Limited Identity and Contact Data includes full names, title, gender, email addresses and telephone numbers (personal or business), occupation or company and position, etc., of you or employees or personnel of your company in contact with, or client of, Milestone;
- Limited Financial and Transaction Data includes billing addresses, delivery addresses, bank account or other transactional details (such as payments to and from you or employees or personnel of your company in contact with, or client of, Milestone);
- Limited Technical Data, Communications Data and Aggregated Data includes internet protocol (IP) address, time zone setting and location, browser platform and patterns and cookies which you use to access our website, your Milestone communication preferences, and the number of users viewing a specific Milestone website feature or subscribing for Milestone updates;
- Notes on interactions we have had with you, be them by phone, e-mail, or face to face. These regard offers on service or software, as well as notes on the provision of the software or services after an order was placed.



Milestone does not collect or use promotional, marketing or statistical data (e.g. information about how you use our website, or statistical or automated data for marketing or advertising from us or third parties, etc.).

Milestone does not collect or use 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) unless you directly provide us with that personal data for a legitimate purpose connected with our dealings with you and we issue you with a specific privacy notice.

We may also receive identity and contact and financial and transaction data about you (or employees or personnel of your company in contact with, or client of, Milestone) from various third parties and public sources such as search information providers or public records (e.g. Companies House)

### **How we use your data, data security and data retention**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- Where we need to comply with a legal or regulatory obligation

Milestone does not share your personal data with third parties for promotional or advertising purposes. We may use your contact details to inform you of new products, services, or offers in relation to your job or position within your company.

We have put in place appropriate organisational and technical measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting 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.

We may share your personal data with those who have a genuine business need to know it (including our suppliers, subcontractors, technical consultants and/or professional advisers, HM Revenue & Customs, regulatory or similar governance and/or administrative bodies). We seek to ensure that any information sharing and processing is always proportionate and access is limited to those whom have a business need to know, and that those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for purposes compatible with which it was collected and in accordance with our instructions.



From time to time Milestone may engage with third parties based outside the European Economic Area (EEA), so their potential processing of your data may involve a transfer of data outside the EEA. If we use those service providers, we will require them to respect a similar degree of protection personal data is afforded in EEA countries.

Our website may contain links to enable you to visit other websites of interest easily. 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 statement. You should exercise caution and look at the privacy statement applicable to the website in question.

### **Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data (e.g. right to request access to the data we hold about you or a right to object to processing of your data where there is no good reason for us continuing to process it). More information can be found at <https://ico.org.uk> . You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (<https://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 at [info@milestoneuk.com](mailto:info@milestoneuk.com).

We try to respond to all legitimate requests within one month. If your request is particularly complex or you have made a number of requests, we will notify you and keep you updated on when to anticipate a response.

Thank you for your interest in our company.

