

# MET LIMITED PRIVACY POLICY

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## How MET handles personal information

MET take the privacy of your information very seriously. Our privacy policy below explains how we will collect and use the information you give us via our websites [www.met.co.uk](http://www.met.co.uk) & [www.metcloud.co.uk](http://www.metcloud.co.uk) collectively referred to as "sites".

We are committed to good information handling principles and the privacy and confidentiality of any personal information we deal with which includes visitors to our sites.

We also provide specific notices and statements, in addition to this privacy policy, to certain individuals whose personal information may be processed when we interact with them. Those notices can be read in conjunction with this privacy policy statement.

In this privacy policy, the word "we" and "MET" refers to Managed Enterprise Technologies Ltd. The terms "you" and "your" mean any visitors and users of our sites.

## Changes to this privacy policy

We will review this policy on a regular basis and, where appropriate, notify you of any changes by email. We encourage you to check this policy frequently for any updates.

## What is personal information?

"Personal Information" has the same meaning as personal data. Personal data is defined in data privacy laws applicable in your country. It includes any information relating to an identified or identifiable natural person. This means any living individual who can be identified directly or indirectly by reference to an identifier such as name, identification number, location data, online identifiers (for example, IP addresses – if they can be used to identify you) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Personal information also includes special or sensitive categories of personal data. This is data about your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning your health, sex life or sexual orientation.

## Categories of personal information

The personal information collected from you or relevant third party sources may include the following:

- your full name, postal address, e-mail address, employer/business and professional information, job titles, telephone and fax numbers;
- any other personal information which you voluntarily provide to us from time to time.

We may combine or supplement this information with other information that we hold about you if you have made inquiries of us before or from third party sources. We may also obtain information from publicly available sources such as the electoral roll, or other third parties who have a legitimate basis to pass on your information.

If you communicate with us by email over the internet you should be aware that information within the message may not be secure and could pass through several different countries before reaching us.

Please do not email us with confidential or sensitive information such as your credit card details. We cannot accept responsibility for unauthorised access to your information that is outside our control.

## What we use personal information for

We will only use your personal information for the purposes that you would reasonably anticipate. If appropriate we will state the purpose at the point when the information is collected.

Some of these purposes may include the following:

1. if you choose to register to receive information or enquire about our services;
2. if you choose to receive our services and to send you newsletters and details of events;
3. to conduct surveys to evaluate our products, services and events;
4. for the purposes of accounting and to manage and audit our operations;
5. where you have provided your consent to contact you occasionally to inform you of new products, services and events we will be providing or that we consider will be of interest to you;
6. processing your request for information or to exercise any rights;
7. diagnosing any problems with our server and administer our sites;
8. processing job applications;
9. research, analysis and developing statistics;
10. complying with legal and regulatory requirements; and
11. establishing and defence of legal rights.

## Our legal basis for processing your personal information

We have described above the purposes for which we may use and otherwise process your personal information in connection with our sites or for our business purposes. We are required by law to indicate to you the legal basis for this use and other processing. This will include (as appropriate):

1. in order that we may perform our services and obligations under any contract with you;
2. processing for legitimate commercial interests provided these are not overridden by your interests and fundamental rights and freedoms;
3. processing which is necessary for compliance with our legal obligations.

Your consent may also be a lawful reason for processing your personal information in certain cases. This means your freely given, specific, informed and unambiguous consent which may be collected from you at the time at which it is requested including in relation to any direct marketing communications.

You should be aware that you are entitled to withdraw your consent where that has been given, at any time. You should be aware that if you do this and if there is no alternative lawful reason for us to rely on to justify the relevant use or other processing on your personal information, this may affect our ability to provide services to you.

## Keeping you informed

We will keep your name, address and contact details on our databases and (unless you have opted-out) we may use that information to make you aware of our own same or similar products, services and events which may be of interest to you.

We may contact you in writing, by telephone or email. If at any time you decide that you do not want your contact details used for these purposes please see the contact us section of this policy.

If you have provided your consent, MET may also disclose personal data to other partner companies who may contact you by your preferred contact method about products, services and events which may be of interest to you.

## Disclosing personal information

MET may share personal information under these limited circumstances:

1. with our business partners in order to deliver our services, this may include agents, IT support, web developers, project delivery staff and others;
2. to third parties who act for us for further processing in accordance with the purposes for which the personal data was originally collected or for purposes to which you have subsequently consented. Where we are making arrangements on your behalf we may need to pass your information to third parties to conclude those arrangements. For example, to administer a pension.
3. to our advisers;
4. to comply with legal requirement and regulatory requirements, for the administration of justice, to protect vital interests, to protect the security or integrity of our databases or this Site, to take precautions against legal liability;
5. with regulatory authorities, courts and governmental agencies to comply with legal orders, legal or regulatory requirements and government requests;
6. if we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets, or otherwise in the event of our merger, re-organisation, dissolution or similar event.

Where appropriate, before disclosing personal information to a third party, we contractually require the third party to take adequate precautions to protect that data and to comply with applicable privacy laws.

## Third party plug-ins and cookies

We make use of third party plug-ins to collect standard internet log information (including IP addresses) about visitors to our sites. We do this to monitor, optimise and improve the use of our sites.

We provide IP address information to a third party for marketing purposes. We do not attempt or allow third parties to attempt to identify an individual using this information.

Cookies are small text files that are placed on your computer by websites that you visit.

Our sites may put cookies onto your computer to collect information about how you browse the site. In particular our cookies are used to:

1. measure how you use the website so it can be updated and improved based on your needs
2. remember the notifications you've seen so that we don't show them to you again

We do not use cookies to identify any individuals.

Visitors to our sites will receive a notification that cookies may be used and will be advised that continued use of the site indicates acceptance of this.

## Retention of personal information

We keep your personal information for no longer than is necessary to fulfil the purposes for which it was collected as described above.

The criteria we use to determine data retention periods for personal information includes the following:

- a. Retention in case of queries. We will retain it for a reasonable period (up to 5 years) in case of queries from you;
- b. Retention in case of claims. We will retain it for the period in which you might legally bring claims against us (in the UK this means we will retain it for 6 years);
- c. Retention in accordance with legal and regulatory requirements. We will consider whether we need to retain it after the period described in (b) because of a legal or regulatory requirement.

If you would like further information about our data retention practices please contact us (see Contact us below).

## Security of personal Information

We endeavour to use appropriate technical and physical security measures to protect personal information which is transmitted, stored or otherwise processed from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access in connection with our Site.

These measures include computer safeguards and secured files and facilities.

Our service providers are also selected carefully and are required to use appropriate protective measures.

## Individual rights

You have various rights under data privacy laws. These may include (as relevant) the right to:

1. access information held about you. You must make your request in writing and provide us with enough information to permit us to identify your personal information. A small statutory fee may be payable and in certain circumstances under the privacy laws, we may not be required to provide all the details of personal data held;
2. amend and rectify personal information that is inaccurate and notify any third party recipients of the necessary changes;
3. request restriction of processing concerning you or to object to processing of your personal information;
4. the right to request the erasure of your personal information where it is no longer necessary for us to retain it;
5. the right to data portability including to obtain personal information in a commonly used machine readable format in certain circumstances such as where our processing of it is based on a consent;
6. the right to object to automated decision making including profiling (if any) that has a legal or significant effect on you as an individual; and

7. the right to withdraw your consent to any processing for which you have previously given that consent.

Please see the contact details in the Contact us section below if you wish to exercise any rights.

We will endeavour to acknowledge requests within 48 hours and full information will be sent promptly and within the relevant statutory timescale.

### **Links to other websites**

Our sites may contain links to other sites not operated or controlled by us. We are not responsible for the data privacy and security on those sites and urge you to review any privacy policy posted on any site you visit before using the site or providing any personal information.

### **International transfers**

Due to the global nature of the internet and many businesses, it may be that your personal information will from time to time be transferred to, or accessed by, parties located in other countries, including outside the European Economic Area ("EEA"). These other countries will either have different data protection laws than your country of residence or they may not have data protection laws. They may not be deemed by the relevant authorities as providing adequate protection for personal information.

Where such processing may occur outside of the EEA, steps will be taken to put in place safeguards (including around security) to protect your personal information when it is in these other countries and ensure there is adequate and appropriate protection for any personal data outside the EEA.

### **Make a complaint**

You have the right to lodge a complaint with the relevant data protection supervisory authority if you consider that we have infringed applicable data privacy laws when processing your personal information.

The data privacy regulator's details in the UK are as follows: Information Commissioner's Office and their site is: <https://ico.org.uk/> which includes current contact details.

### **Contact us**

If you wish to provide comments or exercise any of your rights you can:

- a) write to the Information Security Officer at MET Ltd, Chamber Building, 75 Harborne Road, Birmingham. B15 3DH or
- b) email [data.protection@met.co.uk](mailto:data.protection@met.co.uk)