



## 1. INTRODUCTION

Host Palace Internet Services is the company name, is committed to protecting and respecting the personal data that we hold. This privacy statement describes why and how we collect and use personal data and provides information about individuals' rights. It applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for the purposes described in this privacy statement or as made clear before collecting personal data.

Personal data is any information relating to an identified or identifiable living person. When collecting and using personal data, our policy is to be transparent about why and how we process personal data.

We process personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose are set out in the relevant sections below.

The personal data that is provided to us is provided either directly from the individual concerned, from a third party acting on behalf of an individual, or from publicly available sources (such as but not limited to internet searches).

Where we receive personal data that relates to an individual from a third party, we request that this third party inform the individual of the necessary information regarding the use of their data. Where necessary, reference may be made to this privacy statement.

## 2. SECURITY

We take the security of all the data we hold seriously. Staff are trained on data protection, confidentiality and security.

We have a framework of policies and procedures which ensure we regularly review the appropriateness of the measures we have in place to keep the data we hold secure.

All information you provide to us is stored on our secure servers.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## 3. DATA THAT WE HOLD

### 3.1 Purpose



This section highlights how Host Palace Internet Services uses customer data. Customers are individuals or organisations who purchase a product of ours. We provide services to individuals as well as organisations. The exact data held will depend on the services to be provided.

Where we engage with individuals, we may collect and process personal data in order to satisfy a contractual or operational obligation. We request that individuals only provide the personal data that is required for us to fulfil our contractual or operational obligation.

### 3.1.1 Why do we process data?

Where data is collected it is used for a number of purposes, as follows;

Providing services to you.

Individual needs of our clients and to ensure that their needs are appropriately satisfied.

Administration. In order to manage and administer our business and services, we may collect and process personal data. This may include (but is not limited to) maintaining internal business records, managing candidate and client relationships, administering candidate / client facing applications.

Regulatory. In order for Host Palace Internet Services to do what it does, we may from time to time be required to collect and process personal data in order to fulfil regulatory, legal or ethical requirements. This may include (but is not limited to) the verification of identity of individuals.

### 3.1.2 What data is processed?

The data that is processed is dependent on the service that is being provided and on the recipient of this service.

Services to customers. Personal data may include name, contact details, IP addresses, business address, job titles, credit card details and any other specifically relevant data.

### 3.1.3 How long do we hold data for?

We retain the personal data processed by us for as long as is considered necessary for the purpose(s) for which it was collected, there may also be occasions which will require data to be kept for longer, however this will typically be for legal purposes.

## 3.2 Business contacts

Business contacts are individuals or organisations who we use to provide a service on our behalf or for Host Palace Internet Services. Personal data from our contacts, which covers both potential and prior customers, are held in our customer relationship management tool (CRM tool).



This information is entered into the system after contact is made between a staff member of Host Palace Internet Services and an individual or a business contact individual.

### 3.2.1 Why do we process data?

Where personal data on business contacts is held, it is used for a number of purposes, as follows;

- To personalize your experience and to allow us to deliver the type of content and product offerings in which you are most interested.
- To allow us to better service you in responding to your customer service requests.
- To administer a contest, promotion, survey or other site feature.
- To quickly process your transactions.
- To ask for ratings and reviews of services or products
- To follow up with them after correspondence (live chat, email or phone inquiries)

### 3.2.2 What data do we hold?

Personal data that may be stored in the CRM tool includes, but is not limited to, name, email address, physical address, job title, and details of the communication between us.

### 3.2.3 How long do we hold data for?

We retain the personal data processed by us for as long as is considered necessary for the purpose(s) for which it was collected.

## 3.3 Our people

We collect personal data for our people as part of the administration, management and promotion of our business activities.

Our staff handbook and partnership deed explain further how personal data is held for our staff and partners.

### 3.3.1 Applicants

Where an individual is applying to work for Host Palace Internet Services, personal data is collected through the application process.

There are a number of purposes that personal data for applicants are collected.

**Employment.** We process an applicant's personal data in order to assess their potential employment at Host Palace Internet Services.

**Administration and management.** We may also use this personal data in order to make informed management decisions and for administration purposes.

Personal data collected for applicants is held for as long as necessary in order to fulfil the purpose for which it was collected, or for a maximum of one year where those purposes no longer become necessary.

### 3.4 Suppliers

We collect and process personal data about our suppliers, subcontractors, and individuals associated with them. The data is held to manage our relationship, to contract and receive services from them, and in some cases to provide professional services to our clients.

#### 3.4.1 Why do we process data?

Receiving goods and services. We process personal data in relation to our suppliers and their staff as necessary to receive the services.

Providing services to our clients. Where a supplier is helping us to deliver professional services to our clients, we process personal data about the individuals involved in providing the services in order to administer and manage our relationship with the supplier and the relevant individuals and to provide such services to our clients.

Administering, managing and developing our businesses and services. We process personal data in order to run our business, including:

- managing our relationship with suppliers;
- developing our businesses and services (such as identifying client needs and improvements in service delivery);
- maintaining and using IT systems;
- hosting or facilitating the hosting of events;
- administering and managing our website and systems and applications.

Security, quality and risk management activities. We have security measures in place to protect our and our clients' information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to our suppliers. We collect and hold personal data as part of our supplier contracting procedures. We monitor the services provided for quality purposes, which may involve processing personal data. Complying with any requirement of law, regulation or a professional body of which we are a member. We are subject to legal, regulatory and professional obligations. We need to keep certain records to show we comply with those obligations and those records may contain personal data.

#### 3.4.2 What data do we hold?

We will hold supplier's names, contacts names, and contact details of suppliers.

### 3.4.3 How long do we hold data for?

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected. Data may be held for longer periods where required by law or regulation and in order to establish, exercise or defend our legal rights.

## 4. PEOPLE WHO USE OUR WEBSITE

When people visit our website, personal data is collected both through automated tracking and interacting with various forms on the website or apps (collectively referred to as the websites).

Personal data may be collected when individuals fill in forms on our websites or by corresponding with us by phone, e-mail or otherwise. This includes information provided when an individual register to use our websites, subscribe to our service, make an enquiry.

## 5. SHARING PERSONAL DATA

We will only share personal data with others when we are legally permitted to do so. When we share data with others, we put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality and security standards.

Personal data held by us may be transferred to:

Fraud prevention agencies

Law enforcement or regulatory agencies or those required by law or regulations  
Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

## 6. INDIVIDUAL'S RIGHTS

Individuals have certain rights over their personal data and data controllers are responsible for fulfilling these rights as follows:

Individuals may request access to their personal data held by us as a data controller. Individuals may request us to rectify personal data submitted to us or, where appropriate, contact us via the relevant website registration page or by amending the personal details held on relevant applications with which they registered. Individuals may request that we erase their personal data.



Where we process personal data based on consent, individuals may withdraw their consent at any time by contacting us or clicking on the unsubscribe link in an email received from us.

Individuals may have other rights to restrict or object to our processing of personal data and the right to data portability.

Individuals may request information about, or human intervention into, any automated data processing that we may undertake.

If you wish to exercise any of these rights, please send an email to [abuse\[at\]host-palace.com](mailto:abuse[at]host-palace.com).

## 7. COMPLAINTS

We hope that you won't ever need to, but if you do want to complain about our use of personal data, please send an email with the details of your complaint to [abuse\[at\]host-palace.com](mailto:abuse[at]host-palace.com). We will look into and respond to any complaints we receive.

## 8. DATA CONTROLLER AND CONTACT INFORMATION

If you have any questions about this privacy statement or how and why we process personal data, please contact us at [abuse\[at\]host-palace.com](mailto:abuse[at]host-palace.com)

## 10. CHANGES TO OUR PRIVACY STATEMENT

Updates to this privacy statement will appear on this website. This privacy statement was last updated on 24/05/2018.