

THIS DOCUMENT OUTLINES THE PRIVACY POLICY AND DATA PROCESSING AGREEMENT OF TINA BRUNNER, TRADING IN THE NAME OF ASSISTICO.

1 OVERVIEW

- 1.1 I am committed to maintaining the confidentiality and privacy of my Customers, and their customers, Personal Information in order to be compliant with the Data Protection Act 2018, any enactment which updates or replaces it, and the EU's General Data Protection Regulation (GDPR) (EU) 2016/679. In the rest of this document, I refer to these enactments as "GDPR".
- 1.2 This Privacy Policy explains how I collect/handle Personal Information from individuals and businesses who are my Customers, as well as the Personal Information that my Customers provide me with for me to carry out The Services that I provide my Customers with.

2 DEFINITION OF TERMS

- 2.1 **"Customer"** - an individual, business, company or other organisation that I provide Services to under contract.
- 2.2 **"The Services"** - the Services agreed under or related to our contract.
- 2.3 **"Personal Information"** - any information that can identify an individual according to GDPR definitions, including: name, email address, postal address, telephone number and any other information that I have been provided with to complete The Services that I have been contracted for.

3 WHAT YOU ARE CONSENTING TO

- 3.1 By contracting with me, or discussing contracting with me or giving me your Personal Information, you agree that:
- the Personal Information you have given me is accurate and up to date;
 - any Personal Information that you have given me about anyone else, for the purposes of my processing on your behalf, is provided under the terms of your own GDPR compliant policy and under a GDPR 'lawful basis' for processing personal data.
 - the terms of this Privacy Policy apply, and that I can collect, use, disclose, store, transmit, or process your/your customers' Personal Information as described in this document, in a GDPR-compliant manner.

4 HOW I WILL COLLECT YOUR PERSONAL INFORMATION

- 4.1 If you are my Customer – I will collect your name, email address, company name, contact numbers and address and any other Personal Information which is necessary in order to be able to provide the Services and to be able to send you an invoice for The Services.
- 4.2 If you work for a Customer – I may collect your Personal Information for the purposes of providing Services to the Customer, which may include your email address, telephone number, contact information and other personal data belonging to you.
- 4.3 If you are a contact or a customer of one of my Customers – I may receive Personal Information about you from my Customer. This may include your name, email address, contact numbers and address and other Personal Information necessary for the purposes of providing the Services.

5 HOW I USE THE PERSONAL INFORMATION I HOLD

- 5.1 If you are a Customer – I will use the Personal information to perform the Services and to compile and send you invoices.
- 5.2 If you work for a Customer – I may use the Personal Information to perform the Services and to send you invoices.
- 5.3 If you are a contact or customer of one of my Customers – I may process Personal Information on behalf of my Customer to perform the Services. I only work with GDPR compliant customers who have strict procedures and policies in place to ensure that they lawfully process Personal Information, and, when shared, I follow their procedures.

6 WHO I DISCLOSE PERSONAL INFORMATION TO

- 6.1 The individual it is about – If you are a Customer or work for a Customer or contact or customer of one of my Customers, I will share with you the Personal Information I hold relating to you if you ask me to do this.
- 6.2 My Customers – all Personal Information provided by my Customers remains their property and they maintain access at all times.
- 6.3 Legal Representative – in the unlikely case of me needing to defend or assert my rights, I may reveal Personal Information to protect myself or if required to under any other legal basis.
- 6.4 Relevant government authorities – I may need to provide Personal Information as a matter of law to regulatory bodies or other authorities who have a statutory right to see it.

7 HOW I DEAL WITH INTERNATIONAL TRANSFERS NEEDED WITH YOUR PERSONAL INFORMATION

- 7.1 As part of my services I use proprietary software, being secure, cloud-based systems to hold Personal Information. The proprietary software providers I use may process data outside the European Economic Area (EEA) and United Kingdom (UK). To the best of my knowledge any transfers of data outside the EEA and UK, which these proprietary software providers may make, are GDPR compliant. Your use of my services indicates your consent to this activity.

8 HOW LONG I KEEP YOUR PERSONAL INFORMATION FOR

- 8.1 If you are a Customer or work for a Customer – I keep all Personal Information, including emails, contracts and Invoices for a minimum of 3 years from the end of the provision of the Services. After that, I may keep certain Personal Information for longer in case the Customer needs my Services again so there is a record of what I have previously provided. I store information on OneDrive (or a similar proprietary software system), which is encrypted and is a cloud-based system for storage to ensure back-ups.
- 8.2 If you are a contact or customer of one of my Customers – If we do not have a direct relationship, I retain Personal Information in accordance with my Customer's GDPR-compliant policies and procedures, where necessary deleting this information within a set period after completion of the Services.

9 HOW I PROTECT PERSONAL INFORMATION

- 9.1 I take administrative and technological measures to prevent unauthorised access, misuse, loss or destruction of data by using OneDrive (or a similar proprietary system) to process, store and back-up data
- 9.2 I password protect all computer equipment and mobile phones and ensure their safe physical storage when not in use.
- 9.3 If utilising large language models and other forms of artificial intelligence I ensure available proprietary security measures are adopted to prevent further dissemination of any data and that any Personal Information is not stored beyond what is necessary for the task.

10 HOW I ENSURE THE ACCURACY OF PERSONAL DATA

- 10.1 As soon as I am aware of any changes to Personal Information I update my records, so please let me know if any Personal Information, such as contact details, change so I can make the necessary updates.

11 WHAT YOUR RIGHTS ARE REGARDING THE PERSONAL DATA I HOLD

- 11.1 Right to access information – if you want to access, correct or update the Personal Information that I hold on you please email me to let me know and I will respond within the timescales set out in GDPR.
- 11.2 Right to be forgotten – if you want all Personal Information removed, I will accommodate this to the extent that I can (legally I am required to maintain records of contracts and this may mean that I cannot delete all your personal data).



12 WHAT YOU NEED TO DO IF YOU HAVE QUESTIONS OR COMPLAINTS ABOUT THIS PRIVACY POLICY

12.1 Please contact me to discuss this.

13 HOW YOU WILL KNOW IF THIS PRIVACY POLICY IS UPDATED

13.1 When I update this document, I will add the latest version to my website.

13.2 You will be able to access the latest version of this document at www.assistico.co.uk.

14 HOW YOU CAN CONTACT ME

14.1 If you have any questions about this Privacy Policy or how I hold your Personal Information please contact me with your question by email: tina@assistico.co.uk: