

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' Personal Information, and the Personal Information of their customers, in accordance with the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and any legislation that updates, replaces or supplements them. In the rest of this document, I refer to these enactments collectively 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 relating to an identified or identifiable individual, as defined by GDPR.

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. Where I process Personal Information on behalf of a Customer, I do so in accordance with the Customer's instructions and applicable data protection legislation.

6 LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION

- 6.1 Where Assistico acts as a data controller, Personal Information is processed only where there is a lawful basis to do so under applicable data protection legislation.
- 6.2 Depending on the circumstances, Assistico may process Personal Information:
- (a) where it is necessary for the performance of a contract or in order to take steps prior to entering into a contract;
 - (b) where it is necessary to comply with a legal obligation;
 - (c) where it is necessary for Assistico's legitimate business interests, provided those interests are not overridden by the rights and freedoms of the individual concerned; or
 - (d) where consent has been provided, where consent is the appropriate lawful basis.
- 6.3 Where Assistico acts solely as a data processor on behalf of a Customer, the Customer remains responsible for determining the lawful basis for processing.

7 CONTROLLER AND PROCESSOR RESPONSIBILITIES

- 7.1 Assistico acts as a data controller in relation to personal data processed for its own business purposes, including customer enquiries, contracts, invoicing, financial records, supplier relationships, legal obligations and the operation of its business.
- 7.2 Where Assistico processes personal data on behalf of a Customer in connection with the Services, Assistico acts as a data processor and the Customer remains the data controller.
- 7.3 When acting as a data processor, Assistico will:
- (a) process personal data only in accordance with the instructions of the Customer;
 - (b) ensure that any person authorised to process personal data is subject to appropriate duties of confidentiality;
 - (c) implement appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage;
 - (d) assist the Customer, where reasonably required, in responding to requests relating to data subject rights;
 - (e) notify the Customer without undue delay upon becoming aware of a personal data breach affecting personal data processed on behalf of the Customer;
 - (f) provide reasonable assistance to the Customer in meeting its obligations under applicable data protection legislation where appropriate and proportionate to the Services provided;
 - (g) delete or return personal data to the Customer at the end of the provision of the Services where requested by the Customer, unless retention is required by law or for legitimate business purposes; and
 - (h) access and process personal data using the Customer's systems, software and platforms, or other systems authorised by the Customer, where necessary to provide the Services.
- 7.4 The subject matter, duration, nature and purpose of the processing, the categories of data subjects, the types of personal data processed and the rights and obligations of the Customer as data controller will vary depending on the Services being provided. These matters will be determined by the Customer's requirements, instructions, policies and procedures and the specific activities undertaken by Assistico on the Customer's behalf from time to time.
- 7.5 In general, Assistico may process personal data relating to employees, workers, volunteers, contractors, customers, members, participants, service users, suppliers, complainants, applicants and other individuals connected with the Customer's activities where necessary to provide the Services.
- 7.6 Personal data processed may include names, contact details, employment information, membership records, participation records, correspondence, complaint information, financial information and other personal data

provided by or on behalf of the Customer, as required for the provision of the Services. Where necessary for the provision of the Services, this may also include special category personal data, as defined by GDPR, and criminal offence data processed on behalf of the Customer in accordance with the Customer's instructions and applicable data protection legislation.

- 7.7 The Customer, as data controller, retains responsibility for determining the lawful basis for processing, providing privacy information to data subjects, responding to data subject rights requests and ensuring that personal data is processed in accordance with applicable data protection legislation.

8 WHO I DISCLOSE PERSONAL INFORMATION TO

8.1 The individual it is about –

- (a) Where Assistico acts as a data controller, I will provide access to Personal Information relating to you where you are entitled to receive it under applicable data protection legislation.
- (b) Where Assistico acts solely as a data processor on behalf of a Customer, requests relating to Personal Information should be directed to the relevant Customer as data controller. Assistico will cooperate with and assist the Customer in responding to such requests where appropriate.

8.2 My Customers –

- (a) Where Assistico acts as a data processor, Personal Information processed on behalf of a Customer remains under the Customer's control as data controller and the Customer maintains access to that information at all times.
- (b) Assistico may disclose Personal Information to a Customer, its authorised representatives, employees, workers, contractors or advisers where necessary to provide the Services or in accordance with the Customer's instructions.

- 8.3 Professional advisers and business support providers – I may disclose Personal Information to professional advisers and trusted third parties who support the operation of Assistico and the provision of the Services, including accountants, bookkeepers, auditors, insurers, IT support providers, software providers, contractors, associates, subcontractors and other business support providers where reasonably necessary. Where Assistico engages contractors, associates, subcontractors or other third parties to assist in providing the Services, Assistico will take reasonable steps to ensure that appropriate confidentiality and data protection obligations apply. Any disclosure will be limited to what is reasonably necessary for the relevant purpose and, where applicable, made in accordance with applicable data protection legislation and the instructions of the relevant Customer where Assistico is acting as a data processor.

- 8.4 Legal Representative – In the unlikely event of me needing to defend or assert my legal rights, I may disclose Personal Information where necessary to protect my interests or where otherwise permitted or required by law.

- 8.5 Relevant government authorities – I may need to provide Personal Information as a matter of law to regulatory bodies, law enforcement agencies, courts or other authorities with a legal right to access that information.

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

- 9.1 As part of my services, I use proprietary software and secure cloud-based systems to store Personal Information. The proprietary software providers I use may process data outside the European Economic Area (EEA) and the United Kingdom (UK). To the best of my knowledge, any transfers of data outside the EEA and UK made by these proprietary software providers are compliant with applicable UK data protection legislation. Where international transfers occur, I rely on the safeguards implemented by those software providers to support compliance with applicable UK data protection legislation.

10 HOW LONG I KEEP YOUR PERSONAL INFORMATION FOR

- 10.1 If you are a Customer or work for a Customer – I retain business records, including contracts, invoices and related correspondence, for as long as required to meet legal, accounting and regulatory obligations, and generally for a minimum of 6 years from the end of the provision of the Services. After that, I may retain limited Personal

Information where there is a legitimate business need to maintain a record of previous services provided, client relationships or historical project information. Personal Information will not be retained for longer than is necessary for these purposes. I store information on OneDrive (or a similar proprietary software system), which is encrypted and provides secure cloud-based storage and back-up facilities.

- 10.2 If you are a contact or customer of one of my Customers – If we do not have a direct relationship, I retain Personal Information only for as long as necessary to provide the Services to my Customer and in accordance with any instructions provided by that Customer. Where appropriate, Personal Information will be deleted or returned to the Customer following completion of the Services, unless I am required to retain it for legal, regulatory or legitimate business purposes.

11 HOW I PROTECT PERSONAL INFORMATION

- 11.1 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.
- 11.2 I password protect all computer equipment and mobile phones and ensure their safe physical storage when not in use.
- 11.3 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.

12 HOW I ENSURE THE ACCURACY OF PERSONAL DATA

- 12.1 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.

13 WHAT YOUR RIGHTS ARE REGARDING THE PERSONAL DATA I HOLD

- 13.1 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.
- 13.2 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).
- 13.3 You may also have additional rights under applicable data protection legislation, including rights to object to processing, request restriction of processing, request data portability and withdraw consent where consent is relied upon as the lawful basis.

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

- 14.1 If you have any questions about this Privacy Policy & Data Processing Agreement, your personal information, or how Assistico processes personal data please contact me by email at tina@assistico.co.uk.
- 14.2 If you have concerns about how your personal information has been collected, used, stored, shared or otherwise handled, you have the right to make a complaint.
- 14.3 Where Assistico processes personal data solely on behalf of a Customer as a data processor, requests, complaints or concerns relating to that processing should be directed to the relevant Customer as data controller. Assistico will cooperate with and assist the Customer in responding to such matters where appropriate.
- 14.4 Complaints should be submitted by email to tina@assistico.co.uk and should include sufficient information to allow the matter to be investigated. Further information is available in the Assistico Complaints Handling Policy available on www.assistico.co.uk.
- 14.5 Upon receipt of your complaint, I will:
- (a) acknowledge your complaint within 5 working days.

- (b) investigate the matter and may contact you if further information is required.
 - (c) aim to provide a full written response and outcome within 30 working days of receiving your complaint.
- 14.6 Where a complaint is particularly complex, involves third parties, requires additional evidence or further investigation, the 30 working day timescale may be extended. If this is necessary, I will explain the reason for the delay, provide an updated expected response date and keep you informed of progress and any revised timelines, as far as possible, throughout the investigation.
- 14.7 As Assistico is operated by a sole trader, all complaints are investigated and managed directly by Tina Brunner.
- 14.8 If you remain dissatisfied with the outcome of your complaint, or if you have concerns about how your personal information has been handled, you have the right to contact the Information Commissioner's Office (ICO):

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

Telephone: 0303 123 1113

Website: www.ico.org.uk/make-a-complaint/

15 HOW YOU WILL KNOW IF THIS PRIVACY POLICY IS UPDATED

- 15.1 When I update this document, I will add the latest version to my website.
- 15.2 You will be able to access the latest version of this document at www.assistico.co.uk.

16 HOW YOU CAN CONTACT ME

- 16.1 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:
- 16.2 Assistico is registered with the Information Commissioner's Office (ICO) as required under applicable data protection legislation.