

Sabre MS Website Privacy Statement

The purpose of this privacy statement is to explain how Sabre MS processes all personal data to fulfil its data protection responsibilities. This statement will be supplemented by 'specific to client' privacy notices when needed.

The scope of this statement covers all related activities by the staff and associates/ consultants of Sabre MS referred to as SMS hereafter.

The role of SMS in data protection terms is that of a data controller where it determines the purpose and use of personal data collected. Once received it becomes the responsibility of the SMS privacy officer (PO), supported by an external DPO, to ensure that it is processed in accordance with the latest UK data protection legislation. The PO & the DPO can be contacted by email using dpo@sabrems.com.

The sort of personal data processed by SMS will only be basic contact information for the purposes of networking, business development, preparing contracts and setting up invoices. Banking details will also be collected for the purpose of paying creditors.

SMS' duty of confidentiality means that SMS staff will treat your personal data with due respect and in confidence. It is only disclosed to those that need to know it. SMS expects the same duty of confidentiality of all third parties with whom it shares your personal data.

Ordinarily SMS does not process your personal data outside the UK but if it necessary, SMS will take the appropriate measures to ensure it is done lawfully and securely.

SMS will always process personal data lawfully and in such instances as described below:

- To respond to your general enquiries, promote SMS services and to be able to stay in touch once any business commitments have ended, we will use our legitimate interests
- To comply with any legal obligation, for example HMRC for tax records
- When it is necessary for the performance of a contract and its prior preparation
- When processing for a pre-defined purpose for which your consent has been sought and recorded prior to that processing commencing

In all cases the processing of personal data by SMS shall be done in accordance with the principles of UK data protection law.

SMS will share personal data with some or all of the following third parties:

- Solicitors appointed by SMS
- The Inland Revenue (HMRC)
- Accountants appointed by SMS and only for accounting purposes
- Contractors/ associates, who are subject to a data processing agreement
- Unspecified recipients but only when compelled to do so for legal reasons

SMS uses reasonable organisational and technical measures to ensure personal data is kept secure in line with its internal information security policy. When appropriate, SMS uses encryption to secure data. Other than mobile phone contact data, all personal data in automated form is processed and backed up using an HM Government accredited supplier. Further details can be found under the 'SERVER SECURITY' section on the homepage of our website.

SMS follows a retention schedule to determine the length of time it holds different types of personal data. The retention schedule is shown below:

- Routine correspondence for casual and contract related business in hard copy or in emails will be stored for 3 years
- Personal data about former customers will be retained for 7 years after the cessation of the contract or last business-related contact, whichever is the later
- Contact data is stored indefinitely unless a valid request to erasure is received from the affected data subject
- Financial records and invoices, which may include personal data, will be retained for 6 years after the end of the current tax year of processing
- By exception, documentation that includes personal data may be retained by SMS beyond the schedule, but only for a specific purpose and only when SMS believes there is a legitimate interest or a legal obligation to do so

At the end of the retention schedule SMS will either return, destroy or delete your personal data and any associated emails or relevant documentation. If it is technically impractical to delete electronic copies of personal data, it will put it beyond operational use. It should be noted that SMS allows up to 3 months after the retention schedule to complete the action.

The SMS websites use cookies (and similar technologies) but visitors to the website are asked to consent to non-essential cookies before these are dropped – please see the separate cookie notice.

SMS websites may link to websites for your interest. If used, you should be aware that SMS has no responsibility for the processing of personal data by these websites.

The UK General Data Protection Regulation defines the rights that you have (although these do not apply in all situations), For convenience, these rights are shown below:

- **Right to be informed** as to how your personal data is being processed by SMS – this is done through this statement or separate SMS privacy notices
- **Right to access** your personal data held by SMS which is done by making a ‘Data Subject Access Request’ (DSAR) to the SMS PO
- **Right to rectification** of your personal data if you believe SMS has collected it incorrectly or it needs to be updated
- **Right to erasure** of your personal data for which SMS no longer has a legitimate purpose to process
- **Right to restrict processing** under certain circumstances, during which time your personal data but will be out of operational use until the related matter is resolved
- **Right to data portability** of your personal data in a machine-readable version, as you have provided but only applicable to data provided with your consent or under contract
- **Right to object** to SMS processing your personal data for which it does not have a legal or contractual obligation
- **Rights related to automated decision making and profiling** (however SMS does not use these techniques in its decision making)

Further details on data subjects’ rights can be found on the Information Commissioner’s Office (ICO) website: <https://ico.org.uk>.

Raising concerns, exercising rights or making queries about our processing of your personal data can be done by contacting the SMS PO or the DPO using the contact address provided above. Please be aware that we will need to be sure of your identity before responding fully. For that reason, you may be asked for proof of ID or other material that, in context, will enable us to verify your identity. Alternatively, you may wish to contact the ICO directly.

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