

# Etive Privacy Policy

## Privacy Policy

At Etive Technologies Ltd, trading as Etive, we are committed to protecting the privacy of our customers and the responsible management of personal information in accordance with Data Protection Laws. Data Protection Laws includes but not limited to the Data Protection Act 1998, its successor and applicable data protection regulations such as the General Data Protection Regulation (GDPR). Our relationship with you is valuable and we understand the importance you place on the privacy and security of information which personally identifies you. In that respect, and whether you are a first time visitor to our website or a regular user, we take your privacy seriously. Please read the following in order to learn more about our privacy policy and our information gathering and dissemination practices.

**Please note that when you subscribe to our service and accept our online “Membership Terms and Conditions”, by doing so you will be accepting the terms of this Privacy Policy (the terms of which are incorporated by reference into our “Membership Terms and Conditions”).**

For the purposes of Data Protection Laws we are the data controller in relation to Digital Log Book. We can be contact at 20 Westfield Avenue, Edinburgh. Scotland. EH11 2TT at [support@etive.org](mailto:support@etive.org) or on 0845

612 0205. We are registered with the Information Commissioner's Office (ICO). Our unique reference number is Z2859330.

## Why we require your information

When you use Digital Log Book in accordance with Data Protection Laws, processing is necessary for the performance of a contract to which you are a party. Similarly, we will process personal data in order to take steps at the request of you prior to entering into a contract with us so that we can carry out the services of the Digital Log Book to you. As part of the service we will process personal data for compliance with a legal obligation that we will be subject to for example, the prevention and detection of fraud. Where we process sensitive data, we will process it in accordance with the explicit consent that we have requested from you.

Etive provides a variety of on-line services, including an online enquiry form which collects personal data when you register with us and when you use our services.

Etive use this information in order to customise the content you see on our pages, to fulfil your request for certain products and services, to communicate with you generally and to contact you or enable you to be contacted about special offers, promotions, news, new events, products and/or services that you may be interested in.

You do not need to provide us with personal data simply to browse our website

## What information do we collect?

We will collect information from you in the following circumstances:

### Enquiry Form

Our enquiry form involves providing us with your name, address, telephone and mobile number and e-mail address. We use this information to provide you with the service you have requested or to answer your queries.

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## Optional Information

We may request optional information from you on our registration forms. We request this optional information so that we may serve you better e.g. to provide more tailored services and so that we may understand our customers better e.g. through internal research, data analysis, market research and product research. If we request this additional information from you we will identify it as optional.

Please note that where you are a subscriber to the Digital Log Book we request 'sensitive personal data' (as defined in Data Protection Laws), such as information on your ethnic background and the state of your health. We will not process your sensitive data without your explicit consent.

## Job Opportunities

We advertise details of job opportunities with Etive on our website. If you apply for one of the available positions, you are required to provide us with contact details in order that we can get in touch with you. These details, together with the contents of your curriculum vitae, will be treated as confidential and will only be used for the purposes of considering you for a particular position.

By completing our job application form, you expressly consent to our processing of your information in connection with your application. If you prefer not to send the application by the Internet you may print it out and post it to us at Etive Technologies Limited, 20 Westfield Avenue, Edinburgh, EH11 2TT.

## Website Usage Data

With or without cookies, our website keeps track of usage data, such as the source address that the page request is coming from i.e. your IP address, domain name, date and time of the page request, the referring website if any and other parameters in the URL e.g. search criteria. We and our key strategic partners use this data to better understand website usage so we know what areas of our website users prefer. This information is stored in log files and is used for aggregated and statistical reporting but is not attributed to you as an individual.

## Security

We recognise industry standards and employ security safeguards to protect information from unauthorised access and misuse. We use the most accurate and current information you provide in order to process your request. Furthermore, whenever you transmit information such as billing or credit card information to us through our website we provide you access to our secure server that allows encryption across the internet.

## What information do we share?

There are times when we are required to share the information we learn from you with other parties. We also have a number of strategic partners who we work with and may share your information with to help enhance your Etive experience. We do not sell or rent your personal information to others. Please note that we will send personal data about you to other companies or people in the following situations;

## Agents etc.

Etive will share your information with professional advisors, strategic partners, survey and research organisations, companies and other individuals and organisations whom we employ to perform functions in certain situations on our behalf. Examples of these functions include delivering packages, sending postal mail, faxes and e-mail, providing marketing assistance in data analysis, handling credit card transactions, fulfilling orders, providing services, including but not limited to careers and employment services and



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following up on enquiries including by phone, e-mail or post). These persons have access to the personal information required in order to perform their functions.

## **Strategic Partners: Government departments, local authorities and housing associations.**

In a number of instances our services are made available in conjunction with a variety of organisations and their affiliates, such as government authorities, housing associations, third-sector service providers as well as a range of other organisations who provide support and advice services, who wish to make our services available to their members, customers, staff and/or affiliates. In such instance if you are a member, customer, member of staff or affiliate of such an organisation or one of their affiliates then your personal data will be accessible by these organisations and their affiliates.

Etive also work with a select number of other organisations on a strategic basis who we feel can help add value to our customers and users of Etive services. Some of these strategic partners can offer services or products and special deals for things like home technology, insurance and green energy, to name just a few areas that we feel Etive users and customers could really benefit from. As part of your membership of Etive or as part of subscribing to any of our products and/or services, these organisations will have the opportunity to contact you and we will work with these organisations to help ensure that this is a welcomed initiative rather than a hindrance and that they respect any requests from customers and users to unsubscribe or opt-out. If you are at any time dissatisfied with one of our strategic partners then we would like to know because we are committed to only working with strategic partners that share our commitment to responsible data management.

## **Compliance with law**

We will release personal information where we are required to by law or by the regulations and other rules including auditing requirements to which we are subject. We may also exchange information with other companies and organisations for fraud protection and credit risk reduction.

## **International Data Transfers**

We do not transfer personal data outside of the European Economic Area (EEA).

## **Your Rights**

### **Amend/update/rectify**

Where your details are incorrect or require updating for example, you have moved address then you shall have the right to have your details amended. Where you have subscribed to our services you may update, amend your details on the Digital Log Book.

### **Right to object to processing**

You have the right to object to processing which is based on legitimate interest, direct marketing purposes (**see Marketing**) or for scientific/historical research and statistics.

### **Right to restrict processing**

You have the right to restrict processing for example, when you object to our processing, where information is inaccurate and needs to be rectified.



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## Subject access

You have a right to ask us for information we may hold about you. This is free of charge and we aim to respond as quickly as possible. Where a request is deemed excessive we may charge a small fee. We will also take steps to verify a request to ensure the correct information is given to the correct individual.

## Portability

Where our processing of your personal data is based on your consent or for the performance of a contract i.e. when you become a subscriber or member you may ask us for a copy of your information in a readable format so that you can use it for your own use or with your permission to transfer the information we hold on you to a service provider.

## Right to erasure

In certain circumstance you may ask us to delete your personal data. For example, when we have stopped processing your personal data, where you no longer require our services or where you withdraw consent.

## Marketing

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at [support@etive.org](mailto:support@etive.org). Where we have sent you marketing communications, you will be able to unsubscribe or opt-out of marketing at any time.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Where we rely on your consent to process personal data, you have the right to withdraw consent at any time.

We want you to be happy so please contact us at [support@etive.org](mailto:support@etive.org) to find out about your rights and how to exercise them.

## Retention policy

We may hold your personal data for as long as it is necessary in accordance with Data Protection Laws. The Digital Log Book allows you to delete your personal data. Where there is a statutory duty to keep personal data we will keep it as long as it is necessary for example, for the prevention and detection of fraud.

## Complaints

We want you to be happy with our services, should you have any concerns please contact us at [support@etive.org](mailto:support@etive.org).

You will also have the right to lodge a complaint with a supervisory authority. In accordance with Data Protection Laws, a data subject has the right to lodge a complaint with a supervisory authority in particular in the Member State of his or her habitual residence, place of work or of an alleged infringement of the GDPR. For the UK, this is the Information Commissioner's Office (ICO). You may find their details at <https://ico.org.uk/>

# Etive Privacy Policy



## Suggestions

If you have any questions or suggestions regarding this Privacy Policy, have any concerns about the practices of our websites or believe we are not properly adhering to our Privacy Policy please contact us at [support@etive.org](mailto:support@etive.org).

## Change of purpose

Where we intend to further process personal data for a purpose other than that for which the personal data was collected, we shall provide you prior to that further processing with information on that purpose and with any relevant further information.

## Changes to Privacy Statement

We may edit this Privacy Policy from time to time. We may edit this Privacy Policy from time to time. If we make any changes we will notify you by posting a prominent announcement on our web pages or by directly contacting you through email. We also recommend that you review our Privacy Policy regularly.

**LAST UPDATED 19 DECEMBER 2017**



Registered Office: 125 Princes Street, Edinburgh, EH2 4AD, UK