

DEVANT

Data Privacy Notice

We are Devant Limited, a company with registered number 04904708 and address 298 Hyde End Road, Spencers Wood, Reading RG7 1DN. Our Data Protection Lead can be contacted at directors@devant.co.uk. We have produced this privacy notice in order to keep you informed of how we handle your personal data. All handling of your personal data is done in compliance with the Data Protection Act 2018 and the General Data Protection Regulation (EU) 2016/679 (together, the "Data Protection Legislation"). The terms "Personal Data", "Special Categories of Personal Data", "Personal Data Breach", "Data Protection Officer", "Data Controller", "Data Processor", "Data Subject" and "process" (in the context of usage of Personal Data) shall have the meanings given to them in the Data Protection Legislation. "Data Protection Lead" is the title given to the member of staff leading our data protection compliance programme in lieu of a requirement for a Data Protection Officer.

What are your rights?

When reading this notice, it might be helpful to understand that your rights arising under Data Protection Legislation include:

- The right to be informed of how your Personal Data is used (through this notice);
- The right to access any personal data held about you;
- The right to rectify any inaccurate or incomplete personal data held about you;
- The right to erasure where it cannot be justified that the information held satisfies any of the criteria outlined in this policy;
- The right to prevent processing for direct marketing purposes, scientific/historical research or in any such way that is likely to cause substantial damage to you or another, including through profile building; and
- The right to object to processing that results in decisions being made about you by automated processes and prevent those decisions being enacted.

You can exercise your right to access personal data held about you by emailing directors@devant.co.uk with the subject line: "Subject Access Request". When you submit a 'subject access request', you will need to provide confirmation of your identity by contacting us using the email address associated with your profile, or attaching a photocopy of your driver's license or passport. This is provided free of charge and our response will be made within thirty (30) days, unless our Data Protection Lead deems your request as being excessive or unfounded. If this is the case, we will inform you of our reasonable administration costs in advance and/or any associated delays, giving you the opportunity to choose whether you would like to pursue your request. If you believe we have made a mistake in evaluating your request, please see the section '[Who can you complain to?](#)'.

If you have questions about any of the rights mentioned in this section, please contact our Data Protection Lead at directors@devant.co.uk.

Who is the Data Controller?

- When it comes to your use of our website, whether we have collected your personal data directly from you for our own purposes or as part of a direct administrative relationship between our business and yours, we are the Data Controller.

What are the lawful bases for processing personal data?

Under Data Protection Legislation, there must be a 'lawful basis' for the use of personal data. The lawful bases are outlined in the following sub-sections of Article 6, Section 1 of the GDPR:

- a) 'your consent';
- b) 'performance of a contract';
- c) 'compliance with a legal obligation';
- d) 'protection of your, or another's vital interests';
- e) 'public interest/official authority'; and
- f) 'our legitimate interests'.

What are Devant's 'legitimate interests'?

Legitimate interests are a flexible basis upon which the law permits the processing of an individual's personal data. To determine whether we have a legitimate interest in processing your data, we balance the needs and benefits to us against the risks and benefits for you of processing your data. This balancing is performed as objectively as possible by our Data Protection Lead. You are able to object to our processing and we shall consider the extent to which this affects whether we have a legitimate interest. If you would like to find out more about our legitimate interests, please contact directors@devant.co.uk.

About our processing of your data

We might collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:

Identity Data such as names, usernames or similar; marital status; title; date of birth; sex and gender.

Contact Data such as addresses; email addresses and telephone numbers.

Financial Data such as bank account and payment card information.

Transaction Data such as information about payments and details of purchases you have made.

Technical Data such as IP addresses; login data; browser info; time zone; location; browser plug-ins; operating systems; platforms and other technology on the device used to access this website.

Profile Data such as usernames; passwords; security answers; purchases/orders; interests; preferences; feedback and responses to surveys, blogs and messages.

Usage Data such as analytics relating to how you use the website.

Marketing and Communications Data such as your preferences about receiving communications from us or third parties.

Special Categories of Data such as details about race or ethnic origins, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, genetic or biometric data.

We also collect, use and share **Aggregated Data** such as statistical or demographic data. Aggregated Data can be derived from your Personal Data but is not itself Personal Data as it cannot be used to reveal your identity. If Aggregated Data is ever used in combination with your Personal Data and becomes identifiable, it will be treated in accordance with this notice.

Devant does not collect any **Special Categories of Personal Data** about you or any information about criminal convictions/offences.

Reference	What categories of information about you do we process?	Why are we processing your data?	Where did we get your personal data from?
Client Services	<ul style="list-style-type: none"> Identity Data Contact Data Financial Data Transaction Data Profile Data 	If you work for one of our customers, we may use your personal data to communicate with you and your business about achieving your business objectives. This processing is conducted lawfully on the basis of 'performance of a contract'.	Directly obtained, or by referral - we will always contact you to notify you of a referral before we first process your data, and within a maximum of thirty (30) days.
B2B Marketing	<ul style="list-style-type: none"> Identity Data Contact Data Transaction Data Marketing and Communications Data 	We occasionally contact individuals representing their businesses at their business addresses in order to market our services to their business, including information about relevant updates in the commercial world. This processing is conducted lawfully on the basis of 'our legitimate interests'.	Directly obtained, or by referral - we will always contact you to notify you of a referral before we first process your data, and within a maximum of thirty (30) days.
Public Contact	<ul style="list-style-type: none"> Identity Data Contact Data 	We make our email addresses publicly available, as well as offering contact methods through our website. We use individual's information sent to us	Directly obtained.

in order to respond to queries. This processing is conducted lawfully on the basis of 'our legitimate interests'.

Web Shop

- Identity Data
- Contact Data
- Financial Data
- Transaction Data

We process individual's information in our web shop for fulfilling online orders for certain services. This processing is conducted lawfully on the basis of 'performance of a contract'. Directly obtained.

What happens if I refuse to give Devant my personal data?

If your personal data is used for Client Services or the Web Shop, your personal information has been collected as part of a statutory obligation arising under s388(4)(a) C.A. 2006, Paragraph 6, Schedule 11, VAT Act 1994 and HMRC Notice 700/21 (October 2013). Failure to process your data could result in us being unable to enter into a contract with you to provide services or being unable to comply with our contractual or legal obligations. The information about you that we have collected for the performance of our contracts is required in order for us to successfully fulfil our obligations to you. If you choose not to provide the personal data requested, we will not be able to enter into a contract with you to provide the services we offer. If we are already processing your personal information under a contract, you must end our contractual relationship (as/where permitted) in order to exercise some of your rights.

What 'cookies' does Devant use?

We may obtain information about your general internet usage and the usage of our website by using a cookie file which is stored on your computer or smartphone. Cookies help us to improve our website and to deliver a better and more personalised service to you, and some of the cookies we use are essential for our website to operate. You can choose whether to allow us to use analytics and/or marketing cookies.

What profiling or automated decision making does Devant perform?

Devant does not perform any profiling or automated decision making based on your personal data.

How long will your personal data be kept?

Devant holds different categories of personal data for different periods of time. Wherever possible, we will endeavour to minimise the amount of personal data that we hold and the length of time for which it is held.

- If we process your data on the basis of 'legitimate interests', we will retain your data for as long as the purpose for which it is processed remains active. We review the status of our legitimate interests every twelve (12) months and will update this notice whenever we determine that either a legitimate interest no longer exists or that a new one has been found.

- All categories of personal data that are held by us because they are essential for the performance of a contract, will be held for a period of six years, as determined by reference to the Limitations Act 1980, for the purposes of exercising or defending legal claims.
- Identity, Contact and Transaction Data are held indefinitely (subject to object by the individual, or individual's having left our client's business) in order to provide a superior service to returning customers.

Who else will receive your personal data?

Devant passes your data to the third parties listed in the section '[Third Party Interests](#)' below.

Does your data leave the EU?

Yes. Details are included in the section '[Third Party Interests](#)' below.

Third Party Interests: Data Controllers

Name or Category of Third Party Controller	What processing are we performing for them?	If applicable - who is their representative within the EU?
HMRC, regulatory authorities or other authorities	We are joint Controller with these authorities who require reporting of processing in some situations.	N/A
Payment Processors	We are joint Controller with these service providers who simply pass payments you make through their services directly to us based on a transaction. These transactions are subject to the provider's privacy notices/policies.	N/A for European based services – please contact directors@devant.co.uk if you would like to find out about a specific representative.
Postal/courier providers	Where these providers act as Data Controller, we are joint Controller with them for the purposes of sending you physical documents.	N/A

Our Data Processors

Name or Category of Third Party Processor	Purposes for carrying out processing	If applicable – where does data leaving the EEA go and what safeguards are in place?
---	--------------------------------------	--

Web hosting providers	Website hosting, including the storage of data forming the website content and processing your Technical Data (and Profile Data, where applicable) in order to provide you with access to our websites.	In the interests of providing a quality service, we use providers located in the United States. These providers are Privacy Shield certified.
Information technology providers	<ul style="list-style-type: none"> • Cloud server systems to help us manage our client databases. • Telephony providers. • Office software providers, such as email clients. • IT Support services, who might require access to our systems (with our strict supervision) in order to remedy faults with our technology. 	In the interests of providing a quality service, in addition to our EU-based service providers we use some providers located in the United States. These providers are either Privacy Shield certified or bound by the contractual provisions of the EU Commissions model clauses.
Outsourced accountancy services	Specialist accountancy and bookkeeping services help us to make sure that our finances are handled properly and within the bounds of the law. They ensure that we take payment properly, and occasionally, that you receive funds due from us.	These services are provided by a UK company.
Outsourced training delivery	Devant's training is provided by TiffCo Limited.	TiffCo is a UK company.
Outsourced marketing services	External marketing support and email marketing services to keep in touch with you and develop new relationships with potential clients.	In the interests of providing a quality service, we use an email marketing service provider located in the United States, which is Privacy Shield certified. Our marketing support is provided by a UK company.

Who can you complain to?

In addition to sending us your complaints directly to directors@devant.co.uk, you can send complaints to our supervisory authority. As Devant predominantly handles the personal data of UK nationals, our supervisory authority is the Information Commissioner's Office. If you believe that we have failed in our compliance with data protection legislation, complaints to this authority can be made by visiting <https://ico.org.uk/concerns/>.