

# Privacy Policy

## 1. Purpose of the policy

This policy sets out how we will collect, process, store and use the information we hold about you/your organisation.

We take seriously the protection of your privacy and confidentiality and we understand that you are entitled to know that your personal data will not be used for any unintended purpose and will not accidentally fall into the hands of a third party.

We undertake to preserve the confidentiality of all information you provide to us.

Our policy complies with UK law, including that required by the EU General Data Protection, Regulation (GDPR) [www.eugdpr.org](http://www.eugdpr.org). This law requires us to tell you about your rights and our obligations to you regarding the processing and control of your personal data.

More information about your rights can be found at [www.knowyourprivacyrights.org](http://www.knowyourprivacyrights.org)

Except as described below, we do not share, sell or disclose any personal information we collect to any third parties.

## 2. The basis on which we process information about you

The law requires us to determine how we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information changes or is no longer relevant, then we shall notify you of the change or immediately stop processing your information.

## 3. Information we process because we have a contractual obligation with you

When you subscribe to receive communications from us, a contract is formed between you and Selnet.

To carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it to provide you with information via our secure system that we believe will be relevant to yourself and your organisation. We may also use it to verify your identity for security purposes.

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

Additionally, we may aggregate this information in a general way and use it to provide generic information on overall membership statistics.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

#### **4. Information we process with your consent**

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including our products and services, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.

Sometimes you might give your consent implicitly, such as when you send us a message by email to which you would reasonably expect us to reply.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class or sector information, for example to monitor the performance of a page on our website.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful. This may include partners on our programmes.

We continue to process your information on this basis until you withdraw your consent, or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us [hello@selnet-uk.com](mailto:hello@selnet-uk.com). However, if you do so, we may not be able to provide you with our membership information further.

#### **5. Information we process because we have a legal obligation**

Selnet is subject to the law like everyone else. Sometimes, we must process your information to comply with a statutory obligation. For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order. This may include your personal information.

#### **6. Information provided on the understanding that it will be shared with a third party**

Our website/s allow you to post information with a view to that information being read, copied, downloaded, or used by other people. Examples include:

- posting a message our forum



- tagging an image or interacting with our social media

In posting personal information, it is up to you to satisfy yourself about the privacy level of every person who might use it. Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.

Provided your request is reasonable and there is no legal basis for us to retain it, then we may agree to your request to delete personal information that you have posted. You can make a request by contacting us at [hello@slnet-uk.com](mailto:hello@slnet-uk.com)

## **7. Complaints regarding content on our website**

We attempt to moderate user generated content, but we are not always able to do so as soon as that content is published.

If you complain about any of the content on our website, we shall investigate your complaint.

If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

Free speech is a fundamental right, so we must make a judgment as to whose right will be obstructed: yours; or that of the person who posted the content that offends you.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

## **8. Complaints**

When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

## **9. Use of information we collect through automated systems when you visit our website**

### **9.1 Cookies**

- Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised



experience and the website owner with statistics about how you use the website so that it can be improved.

- Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.
- Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.
- Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.
- When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.
- If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.
- We use cookies in the following ways:
  - to track how you use our website
  - to record whether you have seen specific messages we display on our website
  - to record your answers to surveys and questionnaires on our site while you complete them.

## **9.2. Personal identifiers from your browsing activity**

- Requests by your web browser to our servers for web pages and other content on our website are recorded.
- We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.
- We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.
- If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

## **9.3. Our use of re-marketing**

- Re-marketing involves placing a cookie on your computer when you browse our website to be able to provide you with information about when you visit some other website.
- We may use a third party to provide us with re-marketing services from time to time. If so, then if you have consented to our use of cookies, you may see advertisements for our products and services on other websites.

## **10. Sending a message to us**

When you contact us, whether by telephone, through our website or by e-mail, we may collect the data you have given to us to reply with the information you need.

We record your request and our reply to increase the efficiency and quality of our service to you. We keep personally identifiable information associated with your message, such as your name and email address to be able to track our communications with you to provide a high-quality service.



## 11. Access to your own information

### 11.1 Access to your personal information

- You may obtain a copy of any information we hold about you by sending us a request by email [hello@slnet-uk.com](mailto:hello@slnet-uk.com)
- After receiving the request, we will tell you when we expect to provide you with the information.

### 11.2 Removal of your information

- If you wish us to remove personally identifiable information from our systems, you can do this email to [hello@slnet-uk.com](mailto:hello@slnet-uk.com). This may limit the service we can provide to you.

### 11.3 Verification of your information

- When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

## 12. Encryption of data sent between us

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

## 13. How you can complain

If you are not happy with our privacy policy or if have any complaint regarding it, you should tell us by email to [hello@slnet-uk.com](mailto:hello@slnet-uk.com)

If a dispute is not settled, then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at [ico.org.uk/concerns](http://ico.org.uk/concerns)

## 14. Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:



- to provide you with the services you have requested. This includes a record of your transactions with us in order to provide the best possible service should you contact us in the future;
- to comply with other law, including for the period demanded by our tax authorities;
- to comply with our funding agreements which usually expect us to keep records for up to seven years;
- to support a claim or defence in court.

## **15. Review of this privacy policy**

We may update this privacy notice from time to time as necessary and the terms that apply to you are those posted on our website on the day. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us by emailing [hello@selnet-uk.com](mailto:hello@selnet-uk.com)

