KitMapper Privacy Notice

KitMapper Limited customer privacy notice

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- Sharing information outside the UK
- How to complain

Contact details

Post

South Wing, Somerset House, Strand, London, Greater London, WC2R 1LA, GB

Telephone

020 3858 7144

Email

gabrielle@kitmapper.com

What information we collect, use, and why

We collect or use the following information to **provide and improve products and services for clients**:

- Names and contact details
- Addresses
- Pronoun preferences
- Occupation

- Transaction data (including details about payments to and from you and details of products and services you have purchased)
- Usage data (including information about how you interact with and use our website, products and services)
- Information relating to compliments or complaints
- Audio recordings (eg calls)
- Records of meetings and decisions

We collect or use the following personal information for the **operation of client or customer accounts**:

- Names and contact details
- Addresses
- Purchase or service history
- Account information, including registration details
- Information used for security purposes
- Marketing preferences

We collect or use the following personal information for **information updates or marketing purposes**:

- Names and contact details
- Profile information
- Marketing preferences

We collect or use the following personal information to **comply with legal** requirements:

- Name
- Contact information
- Identification documents
- Client account information
- Any other personal information required to comply with legal obligations

We collect or use the following personal information for recruitment purposes:

 Contact details (eg name, address, telephone number or personal email address)

- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Right to work information

We collect or use the following personal information for **dealing with queries**, **complaints or claims**:

- Names and contact details
- Address
- Payment details
- Account information
- Purchase or service history
- Photographs
- Customer or client accounts and records
- Financial transaction information
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

Your right of access - You have the right to ask us for copies of your
personal information. You can request other information such as details about
where we get personal information from and who we share personal
information with. There are some exemptions which means you may not

receive all the information you ask for. You can read more about this right here.

- Your right to rectification You have the right to ask us to correct or delete
 personal information you think is inaccurate or incomplete. You can read more
 about this right here.
- Your right to erasure You have the right to ask us to delete your personal information. You can read more about this right here.
- Your right to restriction of processing You have the right to ask us to limit how we can use your personal information. You can read more about this right here.
- Your right to object to processing You have the right to object to the processing of your personal data. You can read more about this right here.
- Your right to data portability You have the right to ask that we transfer the
 personal information you gave us to another organisation, or to you. You can
 read more about this right here.
- Your right to withdraw consent When we use consent as our lawful basis
 you have the right to withdraw your consent at any time. You can read more
 about this right here.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide and improve products and services for clients** are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Contact management and business planning
 — we might reach out to contacts to get their input and opinion on our products, which then would lead our training strategy.

Our lawful bases for collecting or using personal information for the **operation of client or customer accounts** are:

- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - o Contact management to keep records of people we work with and wish to communicate with about our work and ways they can help.
 - o Quality management to keep contact with customers regarding the progress of their project.

Our lawful bases for collecting or using personal information for **information updates or marketing purposes** are:

 Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Our lawful bases for collecting or using personal information to **comply with legal requirements**:

- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **recruitment purposes** are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

 Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **dealing with queries**, **complaints or claims** are:

- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - o Quality management to keep contact with customers regarding the progress of their project.

Where we get personal information from

- Directly from you
- Publicly available sources
- Previous employment
- Suppliers and service providers

How long we keep information

KitMapper and their data processors retain personal information for the longest time allowable by applicable law. Personal data is kept for as long as there is a business need, otherwise it is destroyed at the earliest opportunity.

Please see our retention schedule below for your reference.

Record type	Retention period	Action
Personal data relating to business support of individual project	30 days	Destroy
Employment applications	Three years	Review and destroy
Invoices and purchase orders and potential client contacts	Five years	Review and destroy

Legal and compliance documents holding no historic value	Indefinitely	Review
Accounting records, product inventories, expense records, audit paperwork		Review and destroy
Bank statements, leases and contracts, payroll records, legal correspondence.	1	Review and destroy

Who we share information with

Data processors

Wheawill & Sudworth / Professional Services / Huddersfield, UK

This data processor does the following activities for us: manage payroll, storage of all our payroll related personal information and payslip generation and preparation for distribution.

Somerset House Trust / Access Services / London, UK

This data processor does the following activities for us: manage staff access cards and their access to 'staff-only' areas.

Account IQ / Accounting Software / Dublin, Ireland

This data processor does the following activities for us: store our client contact details and their invoice statuses.

Copper / Client Relationship Management Software / San Francisco, USA

This data processor does the following activities for us: store client, supplier, freelance staff and potential customer contacts, and provide opportunity and communications tracking.

Xero / Accounting Software / Wellington, New Zealand

This data processor does the following activities for us: store client contact, client business' addresses and their bank details.

Tidio / Website Chat Function Software / San Francisco, USA and Szczecin, Poland

This data processor does the following activities for us: store client's and potential customer's name, contact data, devices IP address, and location data.

MailChimp / Electronic Newsletter Manager / Atlanta, USA

This data processor does the following activities for us: manage marketing consent and store potential customer's contact data and contact preference.

DigitalOcean / Website Hosting Services / San Francisco, USA

This data processor does the following activities for us: store and handle staff images and client testimonials and website traffic.

Booqable / Rental Management Software / Amsterdam, The Netherlands

This data processor does the following activities for us: store customer contact details and their order and transaction details.

Stripe / Card Payment Software / Dublin, Ireland and San Francisco, USA

This data processor does the following activities for us: store customer contact, bank account and transaction details.

Handelsbanken / Banking Services / London, UK

This data processor does the following activities for us: store customer, staff and supplier bank details.

Starling / Banking Services / London, UK

This data processor does the following activities for us: store customer, staff and supplier bank details, supplier and freelance staff invoices, that may contain their contact details.

Float / Resource Management Software / New York, USA

This data processor does the following activities for us: store details and track employee time-off requests and days taken.

Slack / Communication Services / San Francisco, USA

This data processor does the following activities for us: track and store internal communications, client contact details and purchase documents (i.e. KitMapper quotes and invoices).

Google / Cloud Hosting Services / USA

This data processor does the following activities for us: store employee, client, potential customer contact and any other personal data collected by KitMapper.

SharePoint / Cloud Hosting Services / USA

This data processor does the following activities for us: store employee onboarding documents, including contact details of staff members and their emergency contacts.

Others we share personal information with

- Professional or legal advisors
- Regulatory authorities
- External auditors
- Organisations we're legally obliged to share personal information with

Sharing information outside the UK

Where necessary, we may transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place.

For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us using the contact information provided above.

Organisation name: Accounts IQ

Category of recipient: Accounting software

Country the personal information is sent to: Ireland

How the transfer complies with UK data protection law: The country or sector has a UK data bridge (also known as Adequacy Regulations)

Where necessary, our data processors may share personal information outside of the UK. When doing so, they comply with the UK GDPR, making sure appropriate safeguards are in place.

For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us using the contact information provided above.

Organisation name: Copper

Category of recipient: customer relationship and contact management database and provider

Country the personal information is sent to: USA, Philliphines, Neitherlands

How the transfer complies with UK data protection law: The country or sector has a UK data bridge (also known as Adequacy Regulations)

Organisation name: Xero

Category of recipient: Accounting and invoice progress tracking provider

Country the personal information is sent to: New Zeland

How the transfer complies with UK data protection law: The International Data Transfer Agreement (IDTA)

Organisation name: Tidio

Category of recipient: Website chat function provider

Country the personal information is sent to: USa and Poland

How the transfer complies with UK data protection law: The country or sector

has a UK data bridge (also known as Adequacy Regulations)

Organisation name: MailChimp

Category of recipient: electronic newsletter distribution and subscription service

Country the personal information is sent to: USA

How the transfer complies with UK data protection law: The International Data

Transfer Agreement (IDTA)

Organisation name: DigitalOcean

Category of recipient: website hosting

Country the personal information is sent to: USA

How the transfer complies with UK data protection law: Addendum to the EU

Standard Contractual Clauses (SCCs)

Organisation name: Booqable

Category of recipient: rental service provider

Country the personal information is sent to: The Netherlands

How the transfer complies with UK data protection law: The country or sector

has a UK data bridge (also known as Adequacy Regulations)

Organisation name: Stripe

Category of recipient: card payment function provider

Country the personal information is sent to: Dublin, Ireland and San Francisco,

USA

How the transfer complies with UK data protection law: The country or sector

has a UK data bridge (also known as Adequacy Regulations)

Organisation name: Float

Category of recipient: resource planning software

Country the personal information is sent to: New York, USA

How the transfer complies with UK data protection law: The International Data

Transfer Agreement (IDTA)

Organisation name: Slack

Category of recipient: communications software

Country the personal information is sent to: San Francisco, USA

How the transfer complies with UK data protection law: The country or sector

has a UK data bridge (also known as Adequacy Regulations)

Organisation name: Google

Category of recipient: cloud storage services

Country the personal information is sent to: USA

How the transfer complies with UK data protection law: Addendum to the EU

Standard Contractual Clauses (SCCs)

Organisation name: SharePoint (Microsoft)

Category of recipient: cloud storage services

Country the personal information is sent to: USA

How the transfer complies with UK data protection law: The country or sector

has a UK data bridge (also known as Adequacy Regulations)

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

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

Helpline number: 0303 123 1113

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

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5 November 2024