



Subject: Website Privacy Policy

Issue Date: Thursday, 25 May 2018

## **1 Document Purpose**

Spartan Solutions Group Limited (Spartan Group) "Spartan Group" "we," "us," "our," or the "Company") is committed to protecting the privacy of individuals who visit our web site, individuals who register to use our services, and individuals who register for our content or events. This Privacy Policy describes Spartan Group's privacy practices in relation to the use of our web site and the related applications, services and programmes offered by Spartan Group, as well as individuals' choices regarding use, access and correction of personal information.

## **2 What does this Policy cover?**

This policy:

- Sets out
  - The types of personal data that we collect about you
  - The legal basis we have for using your personal data
- Explains
  - How and why we collect and use your personal data
  - How long we keep your personal data for
  - When, why and with who we will share your personal data
  - The effect of refusing to provide the personal data requested
  - The different rights and choices you have when it comes to your personal data
  - How we may contact you and how you can contact us

## **3 What personal data do we collect about you?**

We collect the information necessary to be able to communicate with you in connection with the services we offer and to help you with your experience. This information includes your name, email address, telephone number and work location. We never collect sensitive personal data about you.

## **4 When do we collect information?**

We collect information from you when you register on our site, subscribe to a newsletter, respond to a survey or marketing communication, fill out a form or enter information, surf the website or use certain other site features on our site.

## **5 How do we use your information?**

We may use the information we collect from you in the following ways:

- To personalize your experience and to allow us to deliver the type of content and product offerings in which you are most interested
- To improve our website in order to better serve you
- Allow us to better service you in responding to your customer service requests
- Administer a contest, promotion, survey or other site feature
- Send periodic emails regarding your order or other products and services
- Follow up with them after correspondence (live chat, email or phone inquiries)

## **6 How long do we keep your personal data for?**

We keep your information in accordance as follows:

- Sales enquiries (12 months after the request)
- Client contact details: 6 years and 1 month after the end of the contract expiration

## **7 How do we protect your information?**

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential.

## **8 Who do we share your personal data with?**

Our policy is not to share your data with any 3rd parties. This does not include website hosting partners and other parties who assist us in operating our website, conducting our business, or serving our users, so long as those parties agree to keep this information confidential. We may also release information when its release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property or safety.

## **9 Do we use 'cookies'?**

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognise your browser and capture and remember certain information.

For instance, we use cookies to help us understand and save a user's preferences for future visits, such as remembering your email address when processing form fill requests for additional content. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved content and services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since every browser is different, look at your browser's Help Menu to learn the correct way to modify your cookies.

## **10 If users disable cookies in their browser**

If you turn cookies off, some web site features will be disabled that make your site experience more efficient and may not function properly.

## **11 3rd Party Advertising**

We have implemented Google Display Network Impression Reporting. Google's advertising requirements can be summed up by [Google's Advertising Principles](#). They are put in place to provide a positive experience for users. We, along with third-party vendors such as Google, use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our website.

## **12 Opting out**

Users can set preferences for how third-party vendors such as Google advertises to you using their settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt-Out page or by using the Google Analytics Opt-Out Browser add on.

## **13 How does our site handle Do Not Track signals?**

We honour Do Not Track signals and Do Not Track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.

## **14      What legal basis do we have for using your information?**

For sales and information enquires it is necessary for our legitimate interests in order to be able to respond to your request. For clients, we may also rely on our processing being necessary to perform a contract for you, for example in contacting you.

## **15      What happens if you do not provide us with the information we request or ask that we stop processing your information?**

If we do not have this information we may not be able to respond fully to your enquiry.

## **16      Do we make automated decisions concerning you?**

No, we do not carry out automated profiling.

## **17      Do we transfer your data outside the EEA?**

No, we do not transfer personal data out of the EEA.

## **18      What rights do you have in relation to the data we hold on you?**

By law, you have a number of rights when it comes to your personal data. Further information and advice about your rights can be obtained from the data protection regulator in your country.

We usually act on requests and provide information free of charge, but may charge a reasonable fee to cover our administrative costs of providing the information for:

- Baseless or excessive/repeated requests
- Further copies of the same information

Alternatively, we may be entitled to refuse to act on the request. Please consider your request responsibly before submitting it. We will respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we will come back to you and let you know.

## **19      How will we contact you?**

We may contact you by phone, email or social media. If you prefer a particular contact means over another, please just let us know.

## **20      Contacting Us**

If there are any questions regarding this privacy policy, or if you are unhappy with how we have handled your information, or have further questions on the processing of your personal data, you may contact us using the information below:

Spartan Group  
Inovo Building  
121 George Street  
Glasgow  
G1 1RD

[info@spartansolutions.com](mailto:info@spartansolutions.com)