

Version 1.0 Author James Harrington This notice sets out the basis which The Milk Men collects personally identifiable information ('Personal Data'), how we process this data, and how to contact us to discuss this data. We collect and receive Personal Data from you via a) your use of our the services provided by us and the services we supply through third party providers.

The Milk Men Ltd is a UK limited company and is the data controller for processing of Personal Data for the Sites and Services. If you wish to contact us relating to our processing your personal data, our contact details are set out below.

The Milk Men Ltd's general commitments to privacy are such that:

- We will only collect, keep, use and share Personal Data needed for the specific business purposes that are explained below, or if we are legally obliged to do so.
- We will be as clear and as transparent as we can with you regarding what Personal Data we collect and how it will be processed.
- For as long as we hold your Personal Data, we will take appropriate measures to secure it, and will provide you with the means to keep it up to date.
- We will not hold your Personal Data for longer than is necessary for the purposes that we initially collected and processed it.

The Milk Men reserves the right to make changes to this notice, as required to by law, or as may be necessary to accommodate changes to The Milk Men's future business practices.

# **Data Collection**

We collect the following data from or about you as an The Milk Men customer or reseller, which may include Personal Data:

- Data collected directly from your business as a mandatory step of the service ordering process, including: a contact name, a contact telephone number, a contact email address, a postal address, and bank details for Direct Debit payment purposes.
- Data volunteered by your business or inputted directly by you via our Sites for the purpose of setup, delivery and configuration of Services, including: site contact name, site contact telephone number, included but not limited to contact email address, postal address and telephone number

Note that while is mandatory to provide The Milk Men with contact, billing and site information for your organisation, it is entirely up to your organisation as to what Personal Data (if any) it provides to meet these business requirements.

# **Data Uses**

We use the data collected from your business for the following legal reasons: because it is necessary to fulfil a contract that we have in place with you; where the processing is necessary for compliance with our legal obligations; or for our legitimate business interests.

Our contract with you as service provider of one or more services, means that we will need to process your data to:

- Deliver, support and maintain the Services that you have ordered.
- Bill you for the Services that you have ordered. Contact you with important updates concerning the status, features, and ongoing development of your active Services.
- Contact you with surveys or feedback requests.
- Contact you regarding any breach of The Milk Men's Terms & Conditions of business,
   Service Level Agreement or Acceptable Use Policy.

When you join The Milk Men we will also invite you to give your consent to receive marketing communications from us by email.

When your contract with The Milk Men is terminated, The Milk Men reserves the right to hold your data for a period of at least 6 months (and generally no longer than 12) in case we need to contact you concerning any matters relating to the cessation of your services and the payment of your final bill.

## WEBSITE VISITORS

The only data we collect on our website is via the contact form. We have no cookies, no analytics and if you use the contact form we only use that data to get in touch with you

# **DATA SHARING**

The Milk Men will not sell your information, nor will we share your information with any third party, except as stated in this Privacy Notice, or as required to operate our services to supply you with Services, to administer your account, or otherwise as required to or permitted by law.

## **DATA PROCESSORS**

We use third party data processors to collect, export, process and store data on our behalf, which may include Personal Data. The processors we are currently using include:

## For provision of telephony and associated services

Inclarity <a href="https://www.inclarity.co.uk/company/privacy-policy/">https://www.inclarity.co.uk/company/privacy-policy/</a>
Dial9 <a href="https://www.dial9.co.uk/legal/privacy">https://www.dial9.co.uk/legal/privacy</a>

### For billing, invoicing and payment services

Gocardless <a href="https://gocardless.com/legal/privacy">https://gocardless.com/legal/privacy</a>
Stripe <a href="https://stripe.com/gb/privacy/">https://stripe.com/gb/privacy/</a>
Xero <a href="https://www.xero.com/uk/about/terms/privacy/">https://www.xero.com/uk/about/terms/privacy/</a>

#### For provision of internet connectivity

Green Telecom <a href="https://greentelecom.co.uk/about-us/codes-of-practice/">https://greentelecom.co.uk/about-us/codes-of-practice/</a>

#### For data centre and hosting services

Waterman Solutions <a href="http://watermansolutions.co.uk">http://watermansolutions.co.uk</a>
Digital Ocean <a href="https://www.digitalocean.com/security/gdpr/data-processing-agreement/Serverpilot.io/gdpr/">https://www.digitalocean.com/security/gdpr/data-processing-agreement/Serverpilot.io/gdpr/</a>

#### For email spam filtering services

Inumbo https://control.inumbo.com/privacypolicy

#### **Computer monitoring services**

Ninja RMM <a href="https://ninjarmm.com/gdpr-policy">https://ninjarmm.com/gdpr-policy</a> Accelo <a href="https://www.accelo.com/company/privacy-policy/">https://www.accelo.com/company/privacy-policy/</a> Office365 <a href="https://privacy.microsoft.com/en-gb/privacystatement">https://privacy.microsoft.com/en-gb/privacystatement</a>

## **Office Management & Call Management Solutions**

Moneypenny <a href="https://www.moneypenny.com/uk/privacy/">https://www.moneypenny.com/uk/privacy/</a>

# YOUR PERSONAL RIGHTS

Your rights in relation to your personal information include:

the right to request access to your personal information (a "subject access request"); correct any mistakes on our records;

erase or restrict your personal information where they are no longer needed for the purpose for which they were obtained or used;

object to our use of personal information based on legitimate business interests, including for profiling and marketing;

(where we rely on your consent to process your personal information) the right to withdraw consent to the processing of your personal information, and

In certain circumstances, receive a machine-readable copy of your personal information.

It is free to make a request to us to exercise your rights. However, we may charge a reasonable fee if your request is clearly unfounded, excessive or repetitive. We will handle any request to exercise your rights in accordance with the relevant data protection laws.

To exercise any of these rights please email us at dpo@themilkmen.co.uk

To assist us in dealing promptly with your request, please make it clear what right you would like to exercise and provide us with the following information:

- Your full name (first name and surname)
- Your contact details for further correspondence (either email or postal address)
- Details of the type of personal information you are seeking

To honour your request The Milk Men may also require you to provide proof of your identity.

You also have the right to make a complaint about how we process your personal data or respond to you following a request to exercise any of your personal data rights. Your complaint should be directed to the UK data protection supervisory authority: the Information Commissioner's Office (ICO). We would request that, if you are not satisfied with a response from us, you first give us the opportunity to resolve the matter to your satisfaction before making any complaint to the ICO.