

XLData Privacy Notice

Some of the information we collect may be classified as "personal data" under European Union (EU) law, as it is information relating to an individual (e.g. a company director, a professional contact etc). This privacy notice provides the information we are required to give in relation to the processing of personal data under EU law.

What Information Do We Collect and Why?

XLData processes data so that it can supply commercial data about organisations to other organisations. The purpose of this processing is to enable businesses to communicate with those organisations for legitimate business purposes, for example marketing.

Therefore we collect information on businesses and business professionals. This is "Commercial Data" and includes company and business professional contact information, including name, job title, address (work/business), phone number (work/business), e-mail address (work/business).

XLData does not seek to collect any information in relation to special categories including race or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation, genetic or biometric data.

Our data originates from organisations providing information directly to us which we usually obtain by telephone or by email.

Unless our customers have explicitly agreed otherwise, we do not obtain personal data from the data our customers supply us with in order to provide them with a service, except for the purposes of our internal marketing.

Who do we share this information with?

We share our Commercial Data (and that may include personal data) we collect with:

- Customers - businesses and organisations with whom we enter into agreements to licence or access our data. The purpose of this processing is to enable businesses to communicate with those organisations for legitimate business purposes, for example marketing.
- Resellers - we licence information to authorized resellers and third party businesses for reselling.
- Updates – the people who update our records (by telephone).

We may also disclose personal data:

- In connection with a sale or merger involving XLData assets or businesses. (In the event that XLData is purchased or sells part or all of the business, the information collected will be considered an asset that can be transferred).
- To a court, tribunal administrative authority law enforcement agencies, regulatory authorities or government agencies. If based in a country outside the EU we would only comply with such a request if there was an international agreement (such as a mutual legal assistance treaty) in place.

International transfers

We might transfer personal data to recipients outside the EU and rely on adequacy decisions, data transfer agreements or other EU approved mechanisms for such transfers.

Data Retention

We store personal data in line with any applicable statutory minimum periods, and then review it periodically (usually annually) to ensure it is still necessary to be retained for the purpose for which it was collected. Where there is a statutory maximum for which data can be retained, such as County Court Judgements we will delete accordingly on expiration.

Grounds of Processing

We process personal data under the grounds of "legitimate interest". XLData legitimate business interest is the supply of commercial data (and the marketing of our business). The purpose of this processing is to enable businesses to communicate with those organisations for legitimate business purposes, for example marketing.

Data Subject Rights

You have the right to request from us confirmation of whether we are processing your personal data, and if so access to that information. We may take up to one month to respond.

If any of your personal data is inaccurate you have a right to request rectification. We are keen to ensure the data we hold is accurate and up to date.

You have the right to object to our processing and/or request it is deleted or restricted, as well as the right to portability of your personal data. In considering our response we undertake to ensure your interests, fundamental rights and freedoms are properly balanced against our legitimate interests. We will also look at whether it is still necessary to process your data for the purpose it was collected.

Before we are able to provide you with any information or correct any inaccuracies we may ask you to verify your identity and to provide other details to help us identify you and respond to your request.

Objecting to receiving direct marketing:

We will always observe your objection to receiving either our XLData marketing or to us passing on your contact details to third parties for their direct marketing purposes:

Updating this Privacy Notice

We strive for continuous improvement in our services, processes and protecting data subject rights. We will therefore update this privacy notice from time to time. Therefore, we advise you to check this notice on a regular basis.

Complaints

All complaints or concerns and appropriate resolution relating to the practices of handling personal information will be logged.

Any complaints of this nature should be made to the data controller:

XLData (XL UK Ltd t/a)

3 Thistlebarrow Road

Bournemouth

Dorset

BH7 7AJ

Or by email: clive.brown@xldata.co.uk

You also have the right to lodge a complaint with a data protection supervisory authority. For the UK this is the Information Commissioner Office.

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