

## Discovery Software Limited - Privacy Policy

This notice explains when and why we collect personal information about you: how we use it, the conditions under which we may disclose it to others, and how we keep it secure.

Our clients should read this notice alongside their contracted Terms of Service.

### Who are we?

Discovery Software Limited is a supplier of software systems to clients. Information about the services we provide is available on our websites [www.discoverysoftware.co.uk](http://www.discoverysoftware.co.uk) and [www.webbookings.co.uk](http://www.webbookings.co.uk). Our services are supplied to individuals, companies, clubs, associations and other organisations.

We collect and process data as a “Data Controller” in relation to clients, prospective clients, employees and other stakeholders.

Additionally, we process data on behalf of our clients for the purpose of delivering contracted services as instructed by them. In this case, our clients are the “Data Controller” and we are a “Data Processor”.

Discovery Software Limited is a limited liability company registered in England and Wales under company number 04372136. Any questions regarding this Privacy Policy should be sent to [info@discoverysoftware.co.uk](mailto:info@discoverysoftware.co.uk).

### Children

Our website is intended for representatives of clients and prospective clients and is not aimed at children. Children should not make enquiries through our website and if we become aware of an enquiry from a child, we will delete that enquiry promptly upon becoming aware of this fact.

The data we hold for our clients may include personal data of children, such as junior members of sports clubs. If you are a child and need further advice or explanation about how your data is collected and used, please contact the organisation who controls your data (our client) in the first instance.

### What personal data do we collect?

There are two broad types of personal data:

- Basic personal data: is the general information that is supplied about yourself – such as your name, address, gender, date of birth, contact details, financial information etc.
- Sensitive personal data: is, by its nature, more sensitive information and may include your racial or ethnic origin, religion, political opinions, health data, philosophical views, biometric and genetic data.

We do hold basic personal data, but we do not hold any sensitive personal data.

### Visitors

We collect personal data when you use our website, make an enquiry or communicate with us.

- Information provided when you communicate with us by phone, email, including records of your contact, your email address or other contact information.

## **Clients and Suppliers / Sub-Contractors**

We collect personal data when you enquire about, set up, administer and use Discovery Software's services or when you enquire about or become a supplier or sub-contractor of Discovery Software. This may include information such as name, email address, phone number for your company or organisation's employees, directors, officers, trustees, volunteers or other stakeholders as required for the purpose of our contract or exploring our prospective contract.

## **Client Data**

In our capacity as a Data Processor, we store personal data supplied to us by clients for the purpose of supplying the contracted services to them. This data varies according to the nature of the services for each client and any questions about the data held for this purpose should be directed to the Data Controller (our client).

## **Information about other people**

If you provide information to us about any person other than yourself, you must ensure that they understand how their information will be used, that you are authorised to disclose it to us, and that they consent to its use on their behalf, before doing so.

## **How do we use personal data?**

### **Using personal data to provide our services**

We use personal data where it is necessary for our business operations, including:

- To deliver services for our clients, on their written instructions
- To communicate with clients, suppliers and sub-contractors

### **Using personal data for our legitimate interests**

We use personal data for our legitimate business interests. Where we do, we make sure we understand and work to minimise its privacy impact. For example, we limit the data to what is necessary, control access to the data and, where we can, aggregate or de-identify the data. For example, we use personal data:

- To promote our services and communicate news and updates
- For fraud prevention
- For network and information systems security.

### **Using personal data with your consent**

There may be some uses of personal data that may require your specific consent. If that is the case, we will contact you separately to ask for your consent which you are free to withdraw at any time.

### **Using personal data where required by law**

We use personal data to comply with the requirements of the law. Under exceptional circumstances, we may be required to provide personal data to law enforcement agencies, courts or others in connection with claims or other litigation.

- For functions such as accounting, statutory reporting etc

## How is personal data shared?

We have a data regime in place to oversee the effective and secure processing of your personal data whether ours as data controller or data processor. We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes.

- We use sub-processors in the delivery of services to clients and they may have access to the personal data we hold specifically for the purpose of delivering contracted services.
- We work with service providers who have access to personal data when they provide us with services such as technical infrastructure, IT and server support, accounting etc.
- In exceptional circumstances, we may share personal data with government agencies and other third parties if we believe it is reasonably necessary to comply with the law or other legal or statutory process; to enforce our agreements, policies and terms; to protect the security of our services; or to respond to an emergency.

In the event any of your information is shared with sub-processors or service providers, we ensure that they comply strictly and confidentially with our instructions and they do not use your personal information for their own purposes unless you have explicitly consented to them doing so.

## International transfers

Discovery Software is based in the United Kingdom, but we engage some service providers and sub-processors who are located outside the EU, in countries that do not provide the same level of data protection as the EU.

When we work with a sub-processor or service provider, we look for a legal mechanism that requires them to protect data to EU standards. For example, the service provider has signed up to the EU-US Privacy Shield, operates under EU-approved binding corporate rules, or is in a country that the EU recognises as having adequate data protection laws. Where no other legal mechanism exists, we enact the EU-approved standard contractual data protection clauses in our contracts.

## How do we protect your personal data?

We recognise that your information is valuable, and we take all reasonable measures to process it securely whilst it is in our care. This includes suitable physical and IT security measures.

## How long do we keep personal data?

We retain personal data for as long as necessary to fulfil the purpose for which the information was collected. We also keep personal data for other legitimate business purposes such as complying with our legal obligations, resolving disputes, preventing fraud, and enforcing our agreements. Because these needs can vary for different data types used for different purposes, retention times will also vary. We consider factors such as:

- How long we need the personal data
- Where we are the Data Controller, whether you have asked us to stop using your data or withdrawn your consent
- Whether we are subject to any obligation (e.g. legal or contractual) to keep the data

## **What are your rights?**

Most of the data we collect and the purposes we use it for are necessary for us to operate and improve our services or to comply with our legal obligations. Where you grant a consent, you may withdraw it at any time.

You may have certain rights under data protection law. These include the right to ask us for a copy of your personal data or to correct it if it is inaccurate or incomplete and, under certain circumstances, to delete or restrict processing of it. If you wish to make a request, or to raise a complaint on how we have handled your personal data, please contact the Data Controller – if this is Discovery Software, please submit your request in writing to: Data Protection, Discovery Software Limited, 11 St Marys Park, Paignton, Devon TQ4 7DA, UK; if this is our client, please consult their privacy policy to obtain the appropriate contact details.

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can complain to the Information Commissioner's Officer (ICO).

## **Changes to This Privacy Policy**

This policy was published on 24th May 2018. We may update this Privacy Policy to reflect changes to our information practices. We encourage you to review the Privacy Policy on our website at [www.webbookings.co.uk/privacypolicy.pdf](http://www.webbookings.co.uk/privacypolicy.pdf) periodically for the latest information on our privacy practices.