

Privacy Policy

This privacy policy tells you what to expect in relation to 'Personal Data' (or 'personal information') about you which is collected, handled, processed, and stored by HSR Design. The processing of Personal Data is governed by the General Data Protection Regulation 2016/679, commonly known as the GDPR.

In summary the GDPR and HSR Design's privacy policy gives individuals eight rights:

- **The right to be informed** on how their data is used
- **The right to access** their personal data
- **The right to be forgotten** and have their data deleted in specific circumstances
- **The right to data portability** to transfer their data to another service provider
- **The right to have information corrected** if it is out of date, incomplete or incorrect
- **The right to object to**, or stop, their data being processed on certain grounds
- **The right to restrict processing**, meaning they can request that their data is only kept on file and not used for processing
- **Rights in relation to automated decision making and profiling**, meaning that in some cases individuals have the right not to be subject to a decision that is based on an automated process

The law requires that the eight data protection principles are followed in the handling of personal data.

HSR Design's new privacy policy will include the following standards that personal data must be:

- Fairly, transparently, and lawfully processed
- Obtain and processed for limited purposes and not in any other manner incompatible with those purposes
- Adequate, relevant, and limited to only data that is necessary to perform the purpose for which it is obtained
- Accurate and up to date
- Not kept for longer that is necessary
- Processed in accordance with the data subject's rights
- Secure

HSR Design is committed to following these values and will be open and transparent about the purposes for which your data will be used.

Who are we?

Under the GDPR, HSR Design is the Data Controller which means it will decide how your personal data is collected, handled, processed, and stored, and for what purposes. If any of your personal information changed, you believe that any of the information held is incorrect, or you have any queries with regards to your personal information or HSR Design's data protection policy and procedures, the please contact HSR Design at chris@hsr-design.co.uk.



What is Personal Data?

According to the law, 'Personal Data' means any information relating to an identified or identifiable individual. An identifiable person is one who can be identified, directly or indirectly in particular by reference to an identification number (e.g. social security number) or one or more factors specific to their physical, physiological, mental, economic, cultural, or social (e.g. name and first name, date of birth, biometrics data, fingerprints, DNA, etc.).

A Data Subject is an identifiable individual person who can be identified, directly or indirectly, from that data. Identification can be the information alone or in combination with other information that is within HSR Design's possession or control, or from other information to which HSR Design legally have access to.

What is the legal basis for processing your Personal Data?

All Personal Data that HSR Design processes will be in accordance with one or more of the following legal bases:

- Consent from the individual (or someone authorised to consent on their behalf)
- Where it is necessary in connection with the contract between HSR Design and an individual or an individual that is authorised to represent a non-natural person with whom there is a contractual relationship
- Where it is necessary because of a legal obligation
- Where it is necessary in an emergency to protect an individual's vital interests
- Where it involves the exercise of a public function – i.e. most activities of government, local government, and other public bodies
- Where it is necessary in the legitimate interests of HSR Design, if the interests of the individual do not outweigh these

How does HSR Design protect your Personal Data?

HSR Design aims to protect your Personal Data, and comply with its obligations under the GDPR, by:

- Keeping Personal Data up to date
- Only storing information in secure locations
- Destroying information that is no longer relevant
- Not collecting or retaining unnecessary or excessive amounts of data
- Protecting Personal Data from loss, misuse, unauthorised access, and disclosure
- Ensuring that appropriate technical measures are in place to protect Personal Data
- Ensuring that due diligence checks on third parties who have legal basis for processing Personal Data are undertaken

Please note that HSR Design has a legal obligation under the GDPR to notify any data breach to the Data Controller without any undue delay. HSR Design therefore has procedures in place for identifying, reviewing, and promptly reporting data breaches to the relevant Data Controller.



What does HSR Design use your Personal Data for?

HSR Design uses your Personal Data to:

- Fulfil our contractual obligations to business or individuals, for goods and services that have been requested and provided
- Verify identity, which may include individuals or businesses where a contractual relationship is proposed or exists, to assess credit and other commercial risks to HSR Design
- Provide you with information, news, events, and activities which are relevant to the goods or services that HSR Design are contractually providing to you or consuming from you
- Provide you with information, news, events, and activities which you have consented HSR Design to do so

Who else has access to your Personal Data?

To ensure that HSR Design operates in an efficient and compliant manner, Personal Data provided to HSR Design may be processed either as part of providing you / providing HSR Design with goods and services for which there is a contractual obligation, or to manage HSR Design (the latter supports HSR Design's 'legitimate interests' as a business).

To provide you / HSR Design with the goods and services that HSR Design / you have agreed to provide, there are several third parties who may need to process your Personal Data:

- Product and service providers whom HSR Design may be contractually obligated to engage with on your behalf
- Insurance providers and intermediaries that are engaged to mitigate risks to HSR Design
- Other third parties based upon HSR Design's 'legitimate interests' as a business. Examples may include data centres that securely store your information and banks that require relevant Personal Data to fulfil obligations on behalf of HSR Design
- Any statutory, government or regulatory body that requests Personal Data that HSR Design are obligated by law or regulation to provide
- Third party institutions which you may have entered in to a contract with during your engagement with HSR Design. You should be aware that the third party will become the Data Controller of any Personal Data that is provided to them either by you or by HSR Design with your consent. However, if your engagement with HSR Design ends, this would not necessarily end your engagement with the third party.

How long does HSR Design keep your data?

HSR Design will keep your data for no longer than reasonably necessary, however there are circumstances when your Personal Data will be retained for a longer period:

- Where there is a statutory or regulatory obligation to retain Personal Data
- To ensure that the business of HSR Design is run in an efficient and complaint manner



What are your rights?

Unless subject to an exemption on the GDPR, you have the following rights in respect to your Personal Data:

- To request a copy of your Personal Data which is held by HSR Design (Access)
- To request HSR Design correct any Personal Data if it is found to be inaccurate or out of date (Rectification)
- To request your Personal Data is erased unless there is a legitimate reason for HSR Design not to comply. HSR Design will always provide you with more details about your rights in our response to your request (Erasure – 'Right to be Forgotten')
- Request that your Personal Data is only kept on file and used for processing (Right to Restrict Processing)
- You have, in some cases, the right not to be subject to a decision that is based on an automated process (Rights in relation to automated decision making and profiling)
- To transmit your Personal Data to another Data Controller (Portability)
- To lodge a complaint with the Information Commissioners Office

If you wish to exercise any of your rights, please see the Contact Details below.

Contact Details

To exercise your relevant rights, queries, or complaints, please contact:

HSR Design
29 Chestnut Road
Southampton
SO16 6BS

chris@hsr-design.co.uk

07980 266184

Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

casework@ico.org.uk

0303 123 1113

