

## Privacy Policy

Streetworks Software Ltd respects your right to privacy. This Privacy Policy sets out details of the information we may collect from you, how we may use that information, how long we may hold it and how we keep your data secure. It also explains your rights and how to exercise them.

In this Privacy Policy, references to “we” or “us” are to Streetworks Software Ltd (“**Streetworks**”), a company incorporated in England and Wales under company number 09477939, whose registered office is at 71 Knowl Piece, Wilbury Way, Hitchin, England, SG4 0TY.

### Information we may collect about you

#### **Personal information provided by you**

The information you give us may include personal information like your name, titles, address, email address, telephone number, date of birth and bank details. You may give us your personal information by filling in forms, including those on our website (<http://www.streetworkssoftware.com>) or by corresponding with us in writing, by telephone, email or otherwise. This includes information you provide when you correspond with us regarding any ongoing works, the [SwIMS Software](#) and/or other [Services](#), or when you report a problem with the website.

We may also receive personal information, such as photos and details of works undertaken by our clients, together with their customer’s personal information, which we use for reference to the records of work undertaken by our clients as a of our Services.

Further information on the information we may collect and the purpose for its processing are below.

#### **Information we collect through our website (use of cookies)**

Our website uses cookies. Cookies are text files placed on your computer to collect Standard Internet Log information and visitor information. These cookies allow us to distinguish you from other users of the website and allow us to collect information about your visit to our website. For more information on which cookies we use and how we use them see **Streetworks’s Cookies Policy**.

#### **Personal information provided by third parties**

We may receive personal information about you from third parties, which may include parties who provide this information in fulfilment of a legal obligation or representatives you have authorised to act on your behalf. Any information we receive about you from these third parties will only be processed for the purposes described under “How will we use the information about you?” section below.

## How we will use the information about you

### **We may process the information we collect about you for the purposes of:**

- performing the contract we are about to enter into or have entered into with you. The lawful basis for this processing is the performance of a contract between you or the organisation by whom you are employed and Streetworks;
- Performing the contract we are about to enter into or have entered into with a client, with whom you will have entered into a contract with for the provision of their respective services (“Client”). We use information received by our Clients, such as photos of works undertaken and work/ Client customer details (“Client Data”), for reference to the records of work undertaken by our Clients which may allow them to support and defend any potential liability or fines they may incur, track productivity, produce reports and collate data for invoicing or their customers in relation to works affecting their property. Streetworks would be acting as a data processor in relation to any such Client Data on the basis that the Client has obtained your prior express consent for us to process your personal information for the purposes of providing them with our services. The lawful basis for this processing is the performance of a contract between you or the organisation by whom you are employed and our Client;
- recruiting, managing, remunerating and communicating with employees and potential employees (“Employee Data”). The Employee Data may include your name, title, email address, home address, phone number, qualifications, education and employment history, references, national insurance number, tax code, bank details and passport or visa details. The source of the Employee Data is you or a third party such as recruitment agencies, former employers and establishments from which you have received your qualifications. The lawful basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract; and
- meeting our statutory obligations and governance obligations, specifically relating to our Shareholders and Directors (“Shareholder Data”). The Shareholder Data may include your name, title, employer, email address, office address, phone number, data of birth, home address and other interests for purposes of recording any conflicts of interest. The source of the Shareholder Data is you or your employer. The lawful basis for this processing is compliance with the law.

### **Sensitive Personal Information (Special Category Data)**

We generally do not ask you to provide us with information regarding your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic data, biometric data, health, sex life or sexual orientation. However, if it is necessary to obtain this information from you in relation to our business activities or to perform a contract with you, we will only collect and process the information with your explicit consent and only for the purpose specified by you when giving your consent.

## Who your information might be shared with

As far as is reasonably necessary, we may disclose your personal data to:

- Our business partner, suppliers, agents and sub-contractors for the purposes described under “How we will use the information about you?” section above. These parties may be engaged for the fulfilment of contracts we have with you and the provision of support services to us: and
- Law enforcement agencies, regulatory bodies, auditors and professional advisors to comply with any legal obligation; or for the purposes of fraud prevention; or in order to enforce any agreements; or protect the rights, property, or safety of Streetworks, its licensees, or others; or obtain any related professional advice.

## Keeping your data secure

We will use technical and organisational measures to safeguard your personal data. All information you provide to us is stored securely.

Unfortunately, the transfer of information via the internet is not entirely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website or email server; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Our website may include links to, or content embedded from third party web services providers. Please note that we have no control over these third-party websites and therefore cannot accept responsibility for the protection and privacy of any information which you provide whilst visiting such third-party websites and such websites are not governed by this privacy policy. It is your responsibility to exercise caution and note the terms of privacy policies relevant to any such third-party websites.

## Retention of your data

We will not retain your personal data for longer than is necessary in relation to the purposes for which the data was collected or otherwise processed. The criteria we use for determining the retention periods for personal data processed in the performance of a contract will be any regulatory requirements, statutory retention periods or guidance provided by regulatory bodies

such as HMRC or the Information Commissioners Office. The statutory limitation period for legal claims related to most contracts is generally 6 years.

Shareholder Data will be retained in perpetuity to ensure a full record of the historic governance of Streetworks.

What rights do you have?

### **Right to request a copy of your information**

You can request confirmation that your data is being processed and a copy of the information we hold for you (this is known as a subject access request).

Should you wish for confirmation that your data is being processed or wish to access the personal data we may hold about you then you can request this from us in writing. Upon written request, we will provide you with a readable copy of the personal data which we keep about you. We will respond to you within the time frame specified within the applicable data protection law, which is generally within one month of receipt of the written request. We will provide the information without charge, but if requests are manifestly unfounded or excessive, in particular because they are repetitive, we retain the right to refuse or to charge a reasonable fee based on the administrative costs of providing the information. To request a copy of the personal data we hold about you please address your written request to the CEO at the address given in the “How can you contact us?” section below.

### **Right to correct any mistakes in your information**

You can require us to rectify the personal data we hold about you if it is inaccurate or incomplete.

Should you require us to rectify the personal data we hold about you, please send a written request to the CEO at the address given in the “How can you contact us?” section below. We will respond to you within the time frame specified within the applicable data protection law, which is generally within one month of receipt of the request.

If we have disclosed your personal data to any third parties, we will also inform those third parties of any correction to your personal data where possible.

**In addition to the above, you will also have the following rights that are applicable to the way we use your data under the General Data Protection Regulation that came into force on 25<sup>th</sup> May 2018:**

### **Right to erasure**

You can require us to erase personal information we hold about you without undue delay in the following circumstances:

- The personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- You object to the processing and there is no overriding legitimate interest for us to continue the processing of the data;
- Your personal data was unlawfully processed; or
- Your personal data must be erased in order to comply with a legal obligation.

Streetworks can refuse to comply with a request to erase personal information we hold about you for the following reasons:

- To exercise the right of freedom of expression and information;
- To comply with a legal obligation for the performance of a public interest task or exercise of official authority;
- For public health purposes in the public interest;
- Archiving purposes in the public interest, scientific research, historical research or statistical purposes; or
- The exercise or defence of legal claims.

If we have disclosed your personal data to any third parties, we will inform those third parties of any erasure of your personal data, unless it is impossible or involves disproportionate effort to do so.

### **Right to restrict processing of your personal data**

You have the right to restrict the processing of your personal data in the following circumstances:

- You contest the accuracy of the personal data;
- The processing is unlawful and you do not wish for the data to be erased but require restricted processing of the data instead; or
- We no longer require your personal data but you require the data to establish, exercise or defend a legal claim.

When processing of your data has been restricted, we will be permitted to store your data but will not perform the processing of it, unless you consent to further processing or processing is necessary for the establishment of a legal claim; for the protection of rights of another person; or for reasons of important public interest.

If we have disclosed your personal data to any third parties, we will inform those third parties about the restriction on the processing of your personal data, unless it is impossible or involves disproportionate effort to do so.

## How to contact us

Please contact us if you have any questions about this privacy policy or the information we hold about you, including making requests to exercise any of your rights in relation to your personal data. If you wish to contact us, please send an email to [info@streetworkssoftware.com](mailto:info@streetworkssoftware.com) or write to us at Streetworks Software Ltd, Office 2, Gransden Park, Potton Road, Abbotsley, St Neots, PE19 6TY or ring us on 01462 887748.

## Complaints

We take your privacy very seriously and try to adhere to the highest standards when collecting and processing your data. However, if you think there is a problem with the way we are processing your personal data, then we encourage you to contact us directly to see if your concerns can be addressed. Please see our **Code of Conduct** for further details on our complaints process.

If you are not satisfied with the outcome of our internal complaints procedure, or if you consider that your complaint has not been handled correctly, you may lodge a complaint with the **Information Commissioners Office**.

## Changes to the Streetworks Privacy Policy

We may change this Privacy Policy from time to time. Any changes we make to this Privacy Policy will be posted on this page and, where appropriate, notified to you by post or email.