

IaaS Privacy Policy

Etive Technologies Limited (Etive) operates Identity as a Service (IaaS). We are committed to protecting the privacy of our customers and the responsible management of personal information in accordance with Data Protection Laws. Data Protection Laws includes but not limited to the Data Protection Act 1998, its successor and applicable data protection regulations including the General Data Protection Regulation (GDPR). Our relationship with you is valuable and we understand the importance you place on the privacy and security of information which personally identifies you. In that respect, and whether you are a first time visitor to our website or a regular user, we take your privacy seriously. Please read the following in order to learn more about our privacy policy and our information gathering and dissemination practices.

For the purposes of Data Protection Laws we are the data controller in relation to Identity as a Service. You can contact us at 20 Wesfield Avenue, Edinburgh, EH11 2TT or email us at support@etive.org or call us on 0845 612 0205.

Please note that when you subscribe to our service and accept our online "Membership Terms and Conditions", by doing so you will be accepting the terms of this Privacy Policy (the terms of which are incorporated by reference into our "Membership Terms and Conditions").

Why we require your information

When you use Identity as a Service in accordance with Data Protection Laws, processing is necessary for the performance of a contract to which you are a party. Similarly, we will process personal data in order to take steps at the request of you prior to entering into a contract with us so that we can carry out the services of the Identity as a Service to you. As part of the service we will process personal data for compliance with a legal obligation that we will be subject to for example, the prevention and detection of fraud. Where we process sensitive data we will process it in accordance with the explicit consent that we have requested from you.

Identity as a Service provides a variety of on-line services, including an online enquiry form which collects personal data when you register with us and when you use our services.

Identity as a Service use this information in order to customise the content you see on our pages, to fulfil your request for certain products and services, to communicate with you generally, to carry out our obligations arising from any contracts entered into between you and us, and to contact you or enable you to be contacted about special offers, promotions, news, new events, products and/or services that you may be interested in.

In addition to our privacy policy, certain services you interact with through Identity as a Service may receive information from or transfer information to a third party. In such circumstances those third parties may have their own privacy policy that governs how they use information provided by you.

You do not need to provide us with personal data simply to browse our website.

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What information do we collect?

We will collect information from you in the following circumstances:

Enquiry Form

Our enquiry form involves providing us with your name, address, telephone and mobile number, e-mail address and in certain circumstances credit card and/or billing information. We use this information to provide you with the service you have requested or to answer your queries.

Registration Details

If you register with Identity as a Service, we will require your personal data. For example; your name, age, your gender, number of dependents and National Insurance number so that you receive the services you require.

Information Provided By You

You can give us information about you by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our on-line services, subscribe to our services, search for a product, place an order on our site, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, report issues to your landlord or local authority, access external job boards and applying to higher education institutions and when you report a problem with our site.

Optional Information

We can request optional information from you on our registration forms. We request this optional information so that we can serve you better e.g. to provide more tailored services and so that we can understand our customers better e.g. through internal research, data analysis, market research and product research. If we request this additional information from you we will identify it as optional.

Sensitive data

Where you subscribe to Identity as a Service certain information that you can choose to enter into your Identity as a Service is 'sensitive personal data' such as information on your ethnic background and the state of your health. Local authorities, housing associations, social landlords, public bodies can require this information so that they are able to deliver their services to you. As part of the services of the Identity as a Service, if you do not consent to the processing of sensitive data, then some parts of the Identity as a Service cannot function to its fullest.

Job Opportunities

We advertise details of job opportunities with Identity as a Service on our website. If you apply for one of the available positions you are required to provide us with contact details in order that we can get in touch with you. These details, together

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with the contents of your curriculum vitae, will be treated as confidential and will only be used for the purposes of considering you for a particular position.

By completing our job application form you expressly consent to our processing your information in connection with your application. If you prefer not to send the application by the Internet you can print it out and post it to us at Etive Technologies Ltd, 20 Westfield Avenue, Edinburgh, EH11 2TT, UK.

Website Usage Data

With or without cookies, our website keeps track of usage data, such as the source address that the page request is coming from i.e. your IP address, domain name, date and time of the page request, the referring website if any and other parameters in the URL e.g. search criteria. We and our key strategic partners use this data to better understand website usage so we know what areas of our website users prefer. This information is stored in log files and is used to administer the site, for troubleshooting, data analysis, testing, research, and for aggregated and statistical reporting but is not attributed to you as an individual.

Information we receive from other sources

We can receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies and can receive information about you from them.

We can combine this information with information you give to us and information we collect about you. We can use this information and the combined information for the purposes set out in this Privacy Policy depending on the types of information we receive.

Security

We recognise industry standards and employ security safeguards to protect information from unauthorised access and misuse. We use the most accurate and current information you provide in order to process your request.

Furthermore, whenever you transmit information such as billing or credit card information to us through our website we provide you access to our secure server that allows encryption across the internet.

What information do we share?

We have a number of strategic partners who we work with and may share your information with to help enhance your Identity as a Service experience. We do not sell or rent your personal information to others. See further information in Strategic Partners.

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We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006. In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

We will send personally identifiable information about you to other companies or people in the following additional situations;

Strategic Partners

In a number of instances our Identity as a Service is made available in conjunction with a variety of organisations and their affiliates, such as local authorities, social landlords, housing associations, government departments such as DWP or sponsors or other strategic partners, who wish to make our Identity as a Service service available to their members, customers, staff and/or affiliates. In such instance if you are a member, customer, member of staff or affiliate of such an organisation or one of their affiliates then your personal data will be accessible by these organisations and their affiliates. The Strategic Partners are based in the United Kingdom.

Identity as a Service also works with a select number of other organisations on a strategic basis who we feel can help add value to our customers and users of Identity as a Service. Some of these strategic partners can offer services/ products and special deals for things like home technology, insurance and green energy, to name just a few areas that we feel Identity as a Service users and customers could really benefit from. Some of these strategic partners can offer services/ products and specialist support and advice on benefits, housing, finance, education and a wide range of other public services. Identity as a Service, local authorities and housing associations believe that Identity as a Service users and customers could benefit from this information.

As part of your use of Identity as a Service or as part of subscribing to any of our products and/or services, these organisations will have the opportunity to contact you and we will work with these organisations to help ensure that this is a welcomed initiative rather than a hindrance and that they respect any requests from customers and users to unsubscribe or opt-out. Where you receive products and/or services from another organisation, such organisations' terms and conditions apply and we have no control over and do not accept any liability or responsibility for the accuracy of the information provided to you by such organisations or displayed on such organisations' websites. If you are at any time dissatisfied with one of our strategic partners then we would like to know because we are committed to only working with strategic partners that share our commitment to responsible data management.

Data Analytics

Identity as a Service may share your information with Analytics and search engine providers that assist us in the improvement and optimisation of our site. You can find further details in our Cookies Policy.

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Compliance with law

We will release personal information where we are required to by law or by the regulations and other rules including auditing requirement to which we are subject. We may also exchange information with other companies and organisations for fraud protection and credit risk reduction.

International Data Transfers

We do not transfer data outside of the European Economic Area (EEA).

Where we store your personal data

Personal data is stored within the European Economic Area (EEA).

Security

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you or where you have chosen a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; 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.

Your Rights

Amend/update/rectify

Where your details are incorrect or require updating for example, you have moved address then you will have the right to have your details amended. Where you have subscribed to our services you can update, amend your details on the Identity as a Service

Right to object to processing

You have the right to object to processing which is based on legitimate interest, direct marketing purposes (see **Marketing**) or for scientific/historical research and statistics.

Right to restrict processing

You have the right to restrict processing for example, where information is inaccurate and needs to be rectified.

Subject access

You have a right to ask us for information we may hold about you. This is free of charge and we aim to respond as quickly as possible. Where a request is deemed excessive we may charge a small fee. We will also take steps to verify a request to ensure the correct information is given to the correct individual. Please contact us at support@etive.org confirming your name, address and email address.



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Portability

You may ask us for a copy of your information in a readable format so that you can use it for your own purposes or with your permission to transfer the information we hold on you to a service provider.

Right to erasure

In certain circumstance you may ask us to delete your personal data. For example, when we have stopped processing your personal data, where you no longer require our services or where you withdraw consent.

Marketing

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at support@etive.org. Where we have sent you marketing communications, you will be able to unsubscribe or opt-out of marketing at any time.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Where we rely on your consent to process personal data, you have the right to withdraw consent at any time.

We want you to be happy so please contact us at support@etive.org to find out about your rights and how to exercise them.

Retention policy

We may hold your personal data for as long as it is necessary in accordance with Data Protection Laws. The Identity as a Service allows you to delete your personal data. Where there is a statutory duty to keep personal data we will keep it as long as it is necessary for example, for the prevention and detection of fraud.

Complaints

We want you to be happy with our services, should you have any concerns please contact us at support@etive.org.

You will also have the right to lodge a complaint with a supervisory authority. In accordance with Data Protection Laws, a data subject has the right to lodge a complaint with a supervisory authority in particular in the Member State of his or her habitual residence, place of work or of an alleged infringement of the GDPR. For the UK, this is the Information Commissioner's Office (ICO). You may find their details at <https://ico.org.uk/>

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Suggestions

If you have any questions or suggestions regarding this Privacy Policy, have any concerns about the practices of our websites or believe we are not properly adhering to our Privacy Policy please contact us at support@etive.org.

Change of purpose

Where we intend to further process personal data for a purpose other than that for which the personal data was collected, we shall provide you prior to that further processing with information on that purpose and with any relevant further information.

Changes to Privacy Statement

We may edit this Privacy Policy from time to time. If we make any changes we will notify you by posting a prominent announcement on our web pages or by directly contacting you through email. We also recommend that you review our Privacy Policy regularly.

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Registered Office: 125 Princes Street, Edinburgh, EH2 4AD, UK