Last Updated: 10 November 2024

Bright Velocity Group Limited customer privacy notice

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- How to complain

Contact details

Email: contact@brightvelocity.co.uk

What information we collect, use, and why

We collect or use the following information to **provide and improve products and services for clients**:

- Names and contact details
- Payment details (including card or bank information for transfers and direct debits)
- Transaction data (including details about payments to and from you and details of products and services you have purchased)
- Information relating to compliments or complaints

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Records of meetings and decisions

We collect or use the following personal information for the **operation of client or customer accounts**:

- · Names and contact details
- Addresses
- Purchase or service history
- Marketing preferences

We collect or use the following personal information for **information** updates or marketing purposes:

· Names and contact details

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Payment details
- Purchase or service history
- Customer or client accounts and records
- Financial transaction information

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data.

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protection rights and the exemptions which may apply on the ICO's website:

 Your right of access - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. You can read more about this right here.

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- Your right to rectification You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. You can read more about this right here.
- **Your right to erasure** You have the right to ask us to delete your personal information. <u>You can read more about this right here</u>.
- Your right to restriction of processing You have the right to ask us to limit how we can use your personal information. You can read more about this right here.
- Your right to object to processing You have the right to object to the processing of your personal data. You can read more about this right here.
- Your right to data portability You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. You can read more about this right here.
- Your right to withdraw consent When we use consent as our lawful basis you have the right to withdraw your consent at any time. You can read more about this right here.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide** and improve products and services for clients are:

 Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

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- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Necessary for our legitimate interests (to develop our products/services and grow our business)

Our lawful bases for collecting or using personal information for the **operation of client or customer accounts** are:

 Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Our lawful bases for collecting or using personal information for **information updates or marketing purposes** are:

- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Necessary for our legitimate interests (to develop our products/services and grow our business), and also to share information or news with our clients that they may find useful.

Our lawful bases for collecting or using personal information for **dealing** with queries, complaints or claims are:

 Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

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Where we get personal information from

- Directly from you
- Publicly available sources

How long we keep information

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Where we have identified a legitimate business interest, we will hold your personal data securely for an indefinite period in order to communicate with you regarding our products and/ or services that may be of interest to you. You may change your preferences at any time or unsubscribe by clicking on the link provided in our communications. You may also exercise your right to unsubscribe at any time by contacting us via contact@brightvelocity.co.uk.

By law we have to keep basic information about our customers (including Contact and Transaction Data) for six years after they cease being customers for tax purposes. In some circumstances you can ask us to delete your data. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Who we share information with

Data processors

HubSpot

This data processor does the following activities for us: Provision of CRM software services

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Xero

This data processor does the following activities for us: Provision of accounting software services

Others we share personal information with

Professional consultants

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint

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