

# Privacy Policy

As of 25th May 2018, the General Data Protection Regulation (GDPR) will be introduced across the European Union. GDPR seeks to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU.

As a data controller regulated by the Information Commissioner's Office (ICO), Servcorp is committed to ensuring that all client data is held and processed securely, for specific and intended purposes, and only for as long as is legally necessary. Servcorp is pleased to provide the following privacy notice to its clients:

## WHAT DATA DO WE COLLECT AND HOW DO WE USE IT?

### Clients

In order to ensure that you are receiving a positive working relationship with Servcorp, we need to hold certain information about you as a client. Valid contact and payment information is required for the purposes of your contractual arrangements between us; this includes monthly payments of invoices and discussing your ongoing service requirements.

At the time of your sign up for Serviced Office, Virtual Office or Co Working Office facilities you will have been required to supply certain identification documentation. This information is collected for the purposes of complying with The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and Section 75 of The London Local Authorities Act 2007. Compliance documentation is a legal prerequisite to Servcorp's services.

### Enquiries

Limited information may be held on individuals/companies who enquire about Servcorp's services via email, telephone, online, or through a broker referral; this information will be limited to the names and contact details provided. This information will be used for the purposes of discussing your business centre requirements. In the event that you do not decide to become a client, we may hold the contact details provided for the sole purpose of extending special offers that become available in the future. You have the right to request that we cease processing this data at any time.

## HOW DO WE COLLECT YOUR DATA?

Data will be collected either directly from you or through other limited sources (such as online).

Data can be supplied directly in person, posted to us, sent via network services (e.g. email or dropbox), or online through the sign up page.

## WHO DO WE SHARE YOUR PERSONAL DATA WITH?

Clients' personal data will only be shared with third-parties in the following cases:

- **Inspections:** Servcorp are subject to inspections from HMRC and the Trading Standards from time-to-time; this is to ensure that we are adhering to The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and Section 75 of The London Local Authorities Act 2007. As part of an inspection, Servcorp may be obliged to show any information that we hold for randomly selected clients.
- **Law Enforcement:** In the event of an investigation by law enforcement agencies on a specific individual/company, Servcorp will be obliged to supply any and all data relevant to the investigation.
- **Customer Due Diligence:** Certain data may be processed through Servcorp's data-verification partner which forms an integral part of our Customer Due Diligence checks. Servcorp's data-verification partner is required to ensure all data screened through their systems is secure and their systems are compliant with GDPR. Your data will be verified through a secure platform.
- **Debt Recovery:** In the event that you fail to adhere to the agreed payment plan of your contract, your account may be transferred to a third-party debt recovery firm for the sole purpose of obtaining the outstanding sum owed

under your Service Agreement; our partner is also required to be compliant with GDPR. The data transferred to Servcorp's chosen third-party debt recovery firm will be limited to contact information. All contact information transferred to Servcorp's third-party debt recovery firm will be erased upon settlement of your account.

## HOW DO WE PROTECT YOUR DATA?

Protection your personal data is a priority to Servcorp. We have put in place appropriate measures that are designed to prevent unauthorised access or misuse of your data. Servcorp's IT team are constantly looking at ways to maintain and improve security measures to protect against cyber-hacks.

Servcorp employees that handle client data are trained on their responsibilities and good-practice processes for ensuring data is kept strictly private and confidential.

## HOW LONG WILL YOUR DATA BE HELD FOR?

All documentation and information supplied at the inception and/or during the course of the business relationship with Servcorp will be held for a minimum of 5 years after the conclusion of the business relationship. This timeframe is stipulated by The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017.

Servcorp cannot consent to erase any client data that is required to be held for compliance with UK laws and regulations until the 5 year period has elapsed.

## CONSENT

In certain circumstances, Servcorp is required to obtain your consent to the processing of your personal data in relation to certain activities. Depending on the purposes for processing the data, the consent will be opt-in consent or soft opt-in consent.

For active clients who have an ongoing contract or liabilities with Servcorp, you have consented to the processing of your data by signing the Service Agreement. You may opt out of marketing emails at any point by withdrawing consent in writing to your Account Manager; we may still contact you on these details for any matters relating to your account unless you provide alternative contact information.

For enquiries or prospective clients, we may hold the contact details provided for the sole purpose of extending special offers that become available in the future. If you are no longer interested in any business centre services or do not wish to be contacted by Servcorp, you have the right to request that we cease processing your data at any time

Where we have obtained your consent to process your personal data for certain activities or consent to market to you, you may withdraw your consent at any time.

## WHAT RIGHTS DO YOU HAVE?

GDPR grants individuals rights to access and/or amend their data, this includes:

- **The right to be informed:** Servcorp has updated its Privacy Policy online, on our Service Agreements and on all Compliance Guides (submitted at the beginning of a business relationship). Any additional information required regarding Servcorp's data protection policies and procedures should be submitted in writing.
- **The right of access:** all clients have the right to ask Servcorp to confirm what information is held about them. You may request that Servcorp updates, modifies or deletes any personal data as long as the request does not conflict with Servcorp's obligations under UK law or Servcorp's ability to administer your account. You also have the right to request copies of the information that we hold for you; this will be subject to Servcorp's ability to verify the identity of the individual requesting the copies. Please be aware that if Servcorp suspects any criminal activity, Subject Access Requests may be rejected until consent is received from the National Crime Agency.

- **The right to rectification:** in the event that any personal data we hold for you is inaccurate, you have the right to contact Servcorp to request the information be rectified.
- **The right to erasure:** In situations where you believe that your data is being processed unlawfully, you have the right to request that your personal data is erased from our systems. Servcorp will need to review the circumstances and decide whether accommodating such a request will clash with our responsibilities under UK Law.
- **The right to restrict processing:** If you believe that there are circumstances which entitle you to request a restriction to the data being processed by Servcorp, you must submit the request in writing for Servcorp to review.
- **The right to data portability:** if you require your data to be transferred to another data controller, we will assist with this where legally necessary. We will require 30 days' notice (although an extension may be required depending on the circumstances) in which we can collate the requested data and transfer copies in a commonly used machine-readable format.
- **The right to object:** If you believe Servcorp is using your data unfairly, you have the right to object. Servcorp will require 30 days to respond to this objection in order to review the matter against the agreed terms of business.
- **The right not to be subjected to automated decision making and profiling:** Generally, Servcorp does not subject individuals to automated decision making and profiling. If you believe aspects of your data are being subjected automatically in a way that causes significant harm to you, you will need to contact us in writing so that the matter can be escalated for review.
- Any requests regarding your rights (as listed above) should be submitted in writing. Servcorp will endeavour to respond to your request within 30 days.

## DATA BREACHES

Servcorp has competent IT security systems in place to ensure that all clients' personal data is kept secure. Servcorp's systems are there to detect, report and investigate any security breaches. In the event that any client data is accessed by unauthorised third-parties through a cyber-attack, the matter will be immediately escalated so that the matter can be reviewed by senior management and reported to the ICO. If we believe that your data has been compromised, you will be informed accordingly.

## COMPLAINTS

If you wish to make a complaint regarding the handling of your data by Servcorp, you have the right to file a complaint. Your complaint should be submitted in writing to your Account Manager whereby it will be escalated to Servcorp's Head Office for review. A response will be provided within 30 days.

Alternatively, you may submit your complaint in writing to Servcorp's Head Office at:

**Post:** Attn: Privacy Policy

Servcorp

Level 17, Dashwood House

London, EC2M 1QS

United Kingdom

Email: [offices@servcorp.co.uk](mailto:offices@servcorp.co.uk)