



INTRODUCTION

Welcome to the SwiftLogic (A trading name of MDBIT Ltd) Privacy Policy.

SwiftLogic respects your privacy and is committed to protecting your personal data. This Privacy Policy will tell you how we look after your personal data.

1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY POLICY

This Privacy Policy aims to give you information on how SwiftLogic collects and processes your personal data.

It is important that you read this Privacy Policy from time to time so that you are fully aware of how and why we are using your data.

CONTROLLER

SwiftLogic is the controller and responsible for your personal data (collectively referred to as, “we”, “us” or “our” in this Privacy Policy).

We have appointed a data protection lead (DPL) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact us via our customer contact page and state that your query is for the attention of the DPL.

CONTACT DETAILS

Our full details are:

Full name of legal entity: MDBIT Ltd, a limited company with registered number 6550926. MDBIT Ltd is registered, and operates, in the United Kingdom.

Postal address: MDBIT Ltd, 49a Martins Road, Keevil, Trowbridge, Wiltshire, BA14 6NA.

You can also contact us through our customer contact page on our Website.

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (<https://ico.org.uk>). In the UK, please read: <https://ico.org.uk/for-the-public/raising-concerns/> for details of how to do this. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.



CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We may need to update this Privacy Policy at any time and without notice and where we do this we will notify you by updates via the News section of our website and/or by emailing our customers.

This Privacy Policy was last updated on 25 May 2018.

It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal data changes during your relationship with us and periodically review your account settings on our website.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Identity Data includes first name and last name.

Contact Data means the data we use to contact you including your invoice address, office address(es), email address and telephone number.

Technical Data means details about your network, computer hardware, internet protocol (IP) address, operating system, login details and other technology you use as part of your business network.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including:

Direct interactions. You may give us your Identity Data, Contact Data, Technical Data, by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- purchase a service;
- sign up for support;
- request contact via our website;
- give us some feedback.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.



- Where we need to comply with a legal or regulatory obligation.

5. DISCLOSURES OF YOUR PERSONAL DATA

We require all third parties to respect the security of your personal data and to treat it in accordance with the law and they may only use your data for the purposes we specify in our contract with them. We will always work with them to protect your privacy.

6. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

You acknowledge that the Internet is not a completely secure medium for communication and, accordingly, we cannot guarantee the security of any information you send to us (or we send to you) via the Internet. We are not responsible for any damages which you, or others, may suffer as a result of the loss of confidentiality of such information.

7. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

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. For example, details of your orders will be kept for as long as we need to retain that data to comply with our legal and regulatory requirements. This is generally 7 years unless the law prescribes a longer period.

In some circumstances you can ask us to delete your data: see 'Your Legal Rights' below for further information.

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.

8. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under UK data protection laws in relation to your personal data.



You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it for example where you consider that we do not need it any longer for the purposes for which we originally collected it as explained to you in this Privacy Policy, where you have withdrawn your consent to our using it and we had relied on that consent according to this Policy, where you consider that we cannot show a ‘legitimate interest’ in continuing to process it and we have relied on that legitimate interest to process it as explained to you in this Policy . You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

If you wish to exercise any of these rights, please contact us via our website, marking your query for the attention of the DPL.



NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES & EXTERNAL THIRD PARTIES

Partners - when you place an order, we share your information with the relevant seller on our marketplace ("Partner") so that they can process and deliver your order.

Cloud storage providers - we use cloud computing platforms that securely store all of our data, including customer details.

Email service providers - in order to send you marketing content and transactional emails, we share your details with our email service providers.



Social Media Platforms - We may make your name and email address available to companies in order to advertise and market our services to you through other platforms on the internet (e.g. Facebook, twitter).

Analytics tools - we use analytics tools to track the way that users interact with our website.

Delivery providers - in order to package and mail your orders to you, it is necessary to share your information with delivery providers.

Marketing and insights providers - marketing and insights tools allow us to understand our customers better so that we may provide you with the best possible website, products and customer service experience. We may share certain information about our customers to facilitate this process.

Customer service platforms - when you interact with our customer service team, your details are shared with our customer service platform providers.