

# ALLSTAR SOLUTIONS LTD

## Privacy Notice

### About this Notice

Allstar Solutions Ltd (“**we**”, “**our**” or “**us**”) take the privacy of your information very seriously. This Privacy Notice is designed to tell you about our practices regarding the collection, use and disclosure of personal information which may be collected in person from you, obtained via our “software as a service” (“**SaaS**”) system (“**Platform**”) or collected through other means such as by an online form, social media, email, or telephone communication.

This notice applies to personal information provided by our contacts, users and clients whose data we process. In this notice “**you**” and “**your**” refers to any individual whose personal data we hold or process. When we do so, we are subject to the UK General Data Protection Regulation (“**UK GDPR**”) and Data Protection Act 2018. We are also subject to the EU General Data Protection Regulation (the “**EU GDPR**”) in relation to services we offer to individuals in the European Economic Area (“**EEA**”). This notice is also provided in accordance with the Australian Privacy Act 1988.

### Personal data we collect and how we process this data

Below we have set out the categories of data we collect, the legal basis we rely on to process the data and how we process the data:

- Contact information for our users, customers and potential customers such as names, usernames of users or clients who have subscribed to our Platform, email addresses, phone numbers, addresses (“**Contact Information**”). We process this information when we communicate with you or provide services to you on the basis of the performance of our services to you and on the basis of our legitimate interest in providing our services to our users or clients.
- A record of any correspondence or communication between you and us (“**Communication Information**”). We process this information when we monitor our relationship with you and provide services to you on the basis of the performance of our contract with you and on the basis of our legitimate interest in providing our services to our clients.
- Information which we hold because you are a client of ours (“**Client Information**”) and which we process during the course of providing our services to you. We process this information on the basis of the performance of our contract with you or on the basis of our legitimate interest in providing our services to you.
- Information which we hold because you are a third party supplier relevant to the services we provide to our clients and end-users (you may for example be a professional adviser, payment processor or marketing software provider) (“**Supplier Information**”). We process this information (including contact and financial information), on the basis of the performance of our contract with you or on the basis of our legitimate interest in providing our services to you.
- Financial information which we hold in the context of providing/receiving services from you (“**Financial Information**”) such as billing and banking information. We process this information when we provide or receive services (as the case may be) on the basis of the performance of our contract with you or on the basis of our legitimate interest in providing our services to you.

- **Cookie Information.** A cookie is a small text file which asks permission to be placed on your computer's hard drive or mobile device. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Where applicable and necessary, we process Cookie Information on the basis that you have consented to this in order to improve or communicate with you about our services and/or to customise the website according to your personal interests. Otherwise and for other technical information (such as IP address data), we process this on the basis of our legitimate interest in providing our services to you. For more information, please see the "Cookies and IP Address" section below.
- Marketing information we may hold about you in order to provide information about our services this may include names, email addresses, phone numbers, addresses, and other information ("**Marketing Information**"). We process this information in order to communicate with you about our products and services on the basis of our legitimate interests in communicating with you about our services or on the basis that you have consented to receive the information.

We will collect information either from you directly or from a third party (for instance, our third party data processors such as Digital Ocean who host our Platform). If we do obtain your personal data from a third party your privacy rights under this notice are not affected and you are still able to exercise the rights contained within this notice.

### **Data Retention**

Our current data retention policy is to delete or destroy (to the extent we are able to) personal data after the following periods:

- Records relating to a contract with us - 7 years from either the end of the contract or the date you last used our services or placed an order with us, being the length of time following a breach of contract in which a contract party is entitled to make a legal claim.
- Marketing records - 3 years from the last date on which you have interacted with us.

For any category of personal data not specifically defined in this notice, and unless otherwise specified by applicable law, the required retention period for any personal data will be deemed to be 7 years from the date of receipt by us of that data. The retention periods stated in this notice can be prolonged or shortened as may be required (for example, in the event that legal proceedings apply to the data or if there is an on-going investigation into the data).

### **Sharing your information**

We may disclose information to third parties in the following circumstances:

- If you are a user of our services, from time to time we may share certain data with our clients (i.e. the organisation for whom you work or for whom you are providing services).
- as part of our services we may provide information to our third party service providers;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation (for example, if required to do so by a court order or for the purposes of prevention of fraud or other crime);
- in order to enforce any terms and conditions or agreements for our services that may apply;

- we may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, but we will take steps with the aim of ensuring that your privacy rights continue to be protected;
- to protect our rights, property and safety, or the rights, property and safety of our users or any other third parties. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

If we do supply your personal information to a third party we will take steps to ensure that your privacy rights are protected and that third party complies with the terms of this notice.

## **Cookies and IP Address**

Like most websites, we use cookies to help provide you with the best experience whilst using our service. The cookies we use are split between the following categories:

- Strictly necessary cookies - which are an essential part of our service and affect the way you can use our site (e.g. security & authentication)
- Performance cookies - which are used for analytics (e.g. understanding usage on our website)
- Functionality cookies - which collect information about your device to help you customise our service (e.g. remembering your username, language, time zone settings or accessing inline help)

On your first visit to our site from your browser we will display a notice to notify you that we are using cookies but we will not load any cookies, except for Strictly Necessary Cookies, until you have provided your consent by clicking the "Accept" button. If you click the "Accept" button on our cookies notice, Performance and Functionality cookies will also be loaded.

As well as cookies that are set by domains we control (first-party cookies), you may also see cookies set by a third party (third-party cookies). These are set when you interact with certain parts of our service and are used by these third-party services to understand your preferences and sometimes tailor content they show you.

Below is a list of the cookies currently used:

### Application Cookies

SESS - This cookie is used to allow users to remain logged-in to the website. Not applicable to users who do not login to the website.

### Third Party Cookies

1P\_JAR, CONSENT, ANID, NID - Set by Google. This group sets a unique ID to remember your preferences and other information such as website statistics and track conversion rates. Google's policies can be viewed at <https://policies.google.com/technologies/types>

\_ga , \_gid, \_gat - Set by Google Analytics. Google Analytics is a web analytics service provided by Google, Inc. ("**Google**"), to help us see how our website is used. In doing so information about your use of our website, including your IP address, may be transmitted to Google and stored on servers in the United States. The data collected by Google Analytics is used to analyse how frequently the same people revisit the website, how the website is found (from advertising or referring websites), and which pages are most frequently viewed. This information is combined with data from thousands of other users to create an overall

picture of website use, and is never identified individually or personally and is not linked to any other information we store about you

You can change the way your browser handles cookies if you wish. You could accept or reject them by default or be notified when a website is trying to set or update cookie. Exactly how you disable cookies depends on the browser or device you are using. The help feature on most browsers will tell you how you can manage and or disable cookies. If you disable cookies on your browser, certain features or parts of our service may not function correctly or will have a degraded experience.

An Internet Protocol (IP) address is a number assigned to your computer by your Internet Service Provider (ISP), so you can access the Internet. We may use your IP address to diagnose problems with our server, report aggregate information, and determine the fastest route for your computer to use in connecting to our service, and to administer and improve the online service.

## **Security**

We will take all reasonable steps to ensure that appropriate technical and organisational measures are carried out in order to safeguard the information we collect from you and protect against unlawful access and accidental loss or damage.

These measures may include (as necessary):

- protecting our servers by both hardware and software firewalls (where applicable);
- locating our data processing storage facilities in secure locations;
- encrypting all data stored on our server with an industry standard encryption method that encrypts the data between your computer and our server so that in the event of your network being insecure no data is passed in a format that could easily be deciphered;
- when necessary, disposing of or deleting your data so it is done so securely;
- regularly backing up and encrypting all data we hold.

We will ensure that our staff are aware of their privacy and data security obligations. We will take reasonable steps to ensure that the employees of third parties working on our behalf are aware of their privacy and data security obligations.

This notice and our procedures for handling personal data will be reviewed as necessary.

## **Your privacy rights**

With respect to your personal data, you have the right to:

- request that your personal data will not be processed;
- ask for a copy of any personal data that we have about you;
- request a correction of any errors in or update of the personal data that we have about you;
- request that your personal data will not be used to contact you for direct marketing purposes;
- request that your personal data will not be used for profiling purposes;
- request that your personal data will not be used to contact you at all;
- request that your personal data be transferred or exported to another organisation, or deleted from our records; or

- at any time, withdraw any permission you have given us to process your personal data

All requests or notifications in respect of your above rights may be sent to us in writing at the contact details listed below. We will endeavour to comply with such requests as soon as possible but in any event we will comply within one month of receipt (unless a longer period of time to respond is reasonable by virtue of the complexity or number of your requests).

If personal data we hold about you is subject to a breach or unauthorised disclosure or access, we will report this to the Information Commissioner's Office (ICO) and/or our data protection manager.

If a breach is likely to result in a risk to your data rights and freedoms, we will notify you as soon as possible.

### **International Data Transfers**

If you are based in the UK or EEA, we will not transfer your personal data in a systematic way outside of the UK or EEA ("**European Area**") but there may be circumstances in which certain personal information is transferred outside of the European Area, in particular:

- If you use our services while you are outside the European Area, your information may be transferred outside the European Area in order to provide you with our services;
- We may communicate with individuals or organisations outside of the services in providing our services, those communications may include personal information (such as contact information) for example you may be outside of the European Area when we communicate with you;
- From time to time your information may be stored in devices which are used by our staff outside of the European Area (but staff will be subject to our information security policies).

If we transfer your information outside of the European Area, and the third country or international organisation in question has not been deemed by the relevant UK Secretary of State to have adequate data protection laws, we will provide appropriate safeguards and we will be responsible for ensuring your privacy rights continue to be protected as outlined in this notice.

If you are based in Australia and your personal information is transferred outside of Australia, we will take reasonable steps to ensure that we comply with data protection standards which are in accordance with the Australian Privacy Principles as set out in the Australian Privacy Act 1988.

### **Contact us**

If at any time you would like to contact us with your views about our privacy practices, or with any enquiry or complaint relating to your personal information or how it is handled, you can do so by us using the details below:

**Address:** 15 Horse Gage Place, Inchtute, Perth, United Kingdom, PH14 9PD  
**Email:** [jhume@allstar-solutions.com](mailto:jhume@allstar-solutions.com)

### **Complaints**

If we are unable to resolve any issues you may have or you would like to make a further complaint, you can contact the Information Commissioner's Office by visiting <http://www.ico.org.uk/> for further assistance.