

1	INTRODUCTION.....	2
2	IMPORTANT INFORMATION AND WHO WE ARE	2
3	DISCLOSURES OF YOUR PERSONAL DATA.....	7
4	INTERNATIONAL TRANSFERS.....	7
5	DATA SECURITY.....	7
6	DATA RETENTION – HOW LONG WILL YOU USE MY PERSONAL DATA FOR?	7
7	YOUR LEGAL RIGHTS	7
8	INFORMATION THAT CMS PROCESSES ON YOUR BEHALF	8
9	GLOSSARY	9



1 Introduction

This website is owned and operated by CMS Tech.

CMS respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and use our services, and tell you about your privacy rights and how the law protects you.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice and for a quick “at a glance” view of the type of personal information and how we use it, please see table below.

2 Important information and who we are

2.1 Purpose of this privacy notice

This privacy notice aims to give you information on how CMS collects and processes your personal data through your use of our website.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. We want to be as transparent as possible in the way in which we use your information so that you can be comfortable in providing the information to us and be clear on why we need certain information.

2.2 Controller

CMS is the controller of this website and responsible for your personal data (collectively referred to as “CMS”, “we”, “us” or “our” in this privacy notice). If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

2.3 Contact details

Our full details are:

- Full name of legal entity: CMS (Co. No. 08297189).
- Our Data Protection Registration Number is ZXZXZXZ
- Contact: Data Protection Manager
- Email address: info@c-m-s.tech
- Postal address: Collision Management Systems Ltd. Studio A/2, Witan Studios, Central Milton Keynes MK9 1EJ

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 (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

2.4 Changes to the privacy notice and your duty to inform us of changes

This notice may be varied from time to time, where possible we will notify you of any changes to this notice. This may be by way of a pop-up notification on the website or communicated to you by another means which you have agreed we may contact you by.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes.

2.5 Third-party links

The website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites

and are not responsible for their privacy statements. When you leave the website, we encourage you to read the privacy notice of every website you visit.

2.6 The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). 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, maiden name, last name, username or similar identifier, marital status, title.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and/or payment card details.
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **Services Data** includes Customers employee names and contact details along with details on Customers personal finances
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use the website.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

2.7 If you fail to provide personal data

Where we need to collect personal data by law, or in order to provide our services to you and you fail to provide that data when requested, we may not be able to provide such services. In this case, we may have to cancel the service you have with us but we will notify you if this is the case at the time.

2.8 How is your personal data collected?

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

- Direct interactions. You may give us your Identity and Contact data when you contact us via this website or by corresponding with us by post, phone, email or otherwise.
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:
- Technical Data from the following parties analytics data from our website hosting provider;

2.9 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. Such as via the 'Contact' service on this website
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data unless we are processing Special Category Data in which case we will use Explicit Consent. You have the right to withdraw consent to marketing at any time by contacting us.

2.10 Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal basis we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest and further description of activity.	Further information and Retention Period
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you	Retained for as long as you are a client. Any billing information retained for 6 years for tax purposes.
To process and deliver our services including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) Provide core services	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us). (c) Explicit Consent.	We collect limited personal data as part of our service contracts. We will retain the information only whilst you are a customer and then it will be securely erased/deleted save for any information that needs to be retained for accounting/tax reporting activity to HMRC.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest and further description of activity.	Further information and Retention Period
To process any enquiry	(a) Identity (b) Contact	(a) Necessary for our legitimate interests	When we process a query or question as part of the service, we will need to process your Identity and Contact information in order to respond to your questions. The question and our response will only be retained for the duration of the time that you are a customer or enquirer and then will be deleted.
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy notice.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)	From time to time we may change our policy, terms of use or the way in which the services operate. We may need to process your information to communicate those changes. Where you are required to accept a change, we will keep a record of that acceptance which may include your personal data to identify you have 2 accepted such changes.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest and further description of activity.	Further information and Retention Period
To administer and protect our business	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation	Retention period – only for as long as is necessary. May be aggregated and identity removed and will no longer be personal data capable of identifying you. No more than 12 months if not aggregated.
To use data analytics to improve our, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)	Retention period – only for as long as is necessary. May be aggregated and identity removed and will no longer be personal data capable of identifying you. No more than 12 months if not aggregated.

2.11 Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside of CMS for marketing purposes.

2.12 Opting out

You can ask us to stop sending you marketing messages at any time by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.

2.13 Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

3 Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

3.1 External Third Parties as set out in the Glossary.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

4 International transfers

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

5 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. All data on this website is hosted on in the UK and encrypted with password and role protection. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

6 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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial 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: see Request erasure 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.

7 Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please review the detail below to find out more about your legal rights. If you wish to exercise any of the rights set out above, please contact us.

7.1 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.

7.2 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.

7.3 Time limit to respond

We try to respond to all legitimate requests within one calendar month. Occasionally it may take us longer than a calendar 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.

8 Information that CMS processes on your behalf

If you handle other people's data using CMS systems, such as information about your customers or employees, you are entrusting that data to us for processing. The data you entrust to us for processing is called service data.

You own your service data. We protect it, limit access to it, and only process it according to your instructions. You may access it, share it through third-party integrations, and request that we export or delete it.

8.1 Information entrusted to CMS and purpose

Information provided in connection with services: You may entrust information that you or your organisation ("you") control, to CMS in connection with use of our services or for requesting technical support for our products. This includes information regarding your customers and your employees (if you are a controller) or data that you hold and use on behalf of another person for a specific purpose, such as a customer to whom you provide services (if you are a processor). The data may either be stored on our servers when you use our services, or transferred or shared to us as part of a request for technical support or other services.

(All the information entrusted to CMS is collectively termed "service data")

8.2 Ownership and control of your service data

We recognise that you own your service data. We provide you complete control of your service data by providing you the ability to (i) access your service data, (ii) share your service data through supported third-party integrations, and (iii) request export or deletion of your service data.

8.3 How we use service data

We only process your service data when you provide us instructions through the various modules of our services.

8.4 Who we share service data with

CMS group and third party sub-processors: In order to provide services and technical support for our products, the contracting entity within the CMS group engages other group entities and third parties. Details on these are available upon request.

- **Employees and independent contractors:** We may provide access to your service data to our employees and individuals who are independent contractors of the CMS group entities involved in providing the services (collectively our "employees") so that they can (i) identify, analyse and resolve errors, (ii) manually verify emails reported as spam to improve spam detection, or (iii) manually verify scanned images that you submit to us to verify the accuracy of optical character recognition. We ensure that access by our employees to your service data is restricted to specific individuals, and is logged and audited. Our employees will also have access to data that you knowingly share with us for technical support or to import data into our products or services. We communicate our privacy and security guidelines to our employees and strictly enforce privacy safeguards within the CMS group.
- **Third-party integrations:** Most of our products and services support integrations with third-party products and services. If you choose to enable any third-party integrations, you may be allowing the third party to access

your service information and personal information about you. We encourage you to review the privacy practices of the third-party services and products before you enable integrations with them.

8.5 Retention of personally identifiable information

We hold personal data in your account as long as you choose to use CMS Services. Once you terminate your CMS user account, all personally identifiable information will eventually get deleted from active database 30 days after the contract has elapsed. The data deleted from active database will be deleted from backups after 3 months.

If you are in the European Economic Area and you believe that someone has entrusted your information to us for processing (for instance, your employer or a company whose services you use), you can request certain actions from us regarding your data. To exercise those data rights, please contact the person or company that entrusted the data to us and we will work with them on your request.

9 Glossary

9.1 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

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.

9.2 THIRD PARTIES

External Third Parties means:

- Service providers acting as processors based in the EU, North America, South America and Columbia who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based the United Kingdom who require reporting of processing activities in certain circumstances.

9.3 YOUR LEGAL RIGHTS

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. 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 withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you believe that any information, we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the following address. We will promptly correct any information found to be incorrect. info@c-m-s.tech