

# Privacy Policy

## 1.0 OUR CORE BELIEFS REGARDING USER PRIVACY AND DATA PROTECTION

- User privacy and data protection are human rights
- We have a duty of care to the people within our data
- Data is a liability, it should only be collected and processed when absolutely necessary
- We will never sell, rent or otherwise distribute or make public your personal information

## 2.0 RELEVANT LEGISLATION

Along with our business and internal computer systems, this website is designed to comply with the following national and international legislation with regards to data protection and user privacy:

- [UK Data Protection Act 1988 \(DPA\)](#)
- [EU Data Protection Directive 1995 \(DPD\)](#)
- [EU General Data Protection Regulation 2018 \(GDPR\)](#)

This site's compliance with the above legislation, all of which are stringent in nature, means that this site is likely compliant with the data protection and user privacy legislation set out by many other countries and territories as well. If you are unsure about whether this site is compliant with your own country of residences' specific data protection and user privacy legislation you should contact our data protection officer (details of whom can be found in section 9.0 below) for clarification.

## 3.0 PERSONAL INFORMATION THAT THIS WEBSITE COLLECTS AND WHY WE COLLECT IT

This website collects and uses personal information for the following reasons:

### 3.1 SITE VISITATION TRACKING

Like most websites, this site uses Google Analytics (GA) to track user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to see their journey through

the website.

Although GA records data such as your geographical location, device, internet browser and operating system, none of this information personally identifies you to us. GA also records your computer's IP address which could be used to personally identify you but Google do not grant us access to this. We consider Google to be a third party data processor (see section 6.0 below).

GA makes use of cookies, details of which can be found on [Google's developer guides](#). FYI our website uses the analytics.js implementation of GA.

Disabling cookies on your internet browser will stop GA from tracking any part of your visit to pages within this website. In addition to Google Analytics, this website may collect information (held in the public domain) attributed to the IP address of the computer or device that is being used to access it.

### **3.2 CONTACT FORMS AND EMAIL LINKS**

Should you choose to contact us using the contact form on our [Contact Us](#) page, none of the data that you supply will be stored by this website or passed to / be processed by any of the third party data processors defined in section 6.0. Instead the data will be collated into an email and sent to us over the [Simple Mail Transfer Protocol \(SMTP\)](#). Our SMTP servers are protected by [TLS](#) (sometimes known as SSL) meaning that the email content is encrypted using [SHA-2](#), 256-bit cryptography before being sent across the internet. The email content is then decrypted by our local computers and devices.

### **4.0 ABOUT THIS WEBSITE'S SERVER**

This website is hosted by CWCS within a UK data centre located just outside London and Nottingham.

Some of the data centre's more notable security features are as follows:

CWCS ISO 27001 certification demonstrates that they protect the confidentiality, integrity and availability of all the information within our organisation. This includes your information.

All staff at CWCS Managed Hosting take security seriously. Very Seriously. This includes security of our data centres, public cloud, private clouds, dedicated servers, shared servers, software, infrastructure, buildings, information, people and equipment. Everything in fact.

## **ISO 27001 Certification**

To prove that they have the strictest security measures in place, CWCS Managed Hosting is formally certified to the internationally accepted global Information Security Management System standard ISO 27001. However, we endeavour to go beyond this and have additional measures in place to really enforce the security and safety of our hosting.

## **A Trusted Hosting Company**

Trust is important to our customers because they know their data, information, applications and infrastructure are in safe hands with CWCS. Time and again, security comes up as a major concern with businesses considering outsourcing their managed hosting, and particularly those considering moving to cloud servers. Colourmedia rely on their knowledgeable, dedicated and friendly staff who do not over or under specify hosting solutions; they focus on the customer's genuine business needs. That's how they've built high levels of trust over the years, and also have high customer retention rates.

## **Physical and Cyber Security**

As well as taking wide-ranging technical measures to keep the servers, data centres and software safe from cyber-attacks, CWCS Managed Hosting also has extensive physical security controls. They systematically examine the information security risks within their organisation and take account of the threats, vulnerabilities and possible effects. This is all backed up with on-going processes to ensure the controls are adequate, maintained and effective. In this way, CWCS and Westwood Landscape Ltd customers have reassurance that the data, websites, business applications and other information held on their cloud hosting infrastructure, shared servers and dedicated servers is as secure as possible.

- Trustworthy hosting
- ISO 27001 certified
- Physical security
- Strict management processes
- Cyber security
- CCTV
- Strict HR policies
- Restricted entry

## **CWCS Staff**

CWCS induct, train and reinforce security to all their employees at all levels. Security is an integral part of everyone's day to day role. It's become engrained in CWCS company culture. Everything from information storage processes and HR practices to internal and external CCTV monitoring, access restrictions and management. Even photography is covered by security procedures.

## **ISO 27001 and Beyond**

ISO 27001 confirms CWCS Managed Hosting is a company committed to security. It provides existing, new and potential customers with proven assurance that they operate to the very highest security standards. However, their commitment to safe and secure hosting goes beyond ISO 27001. Security of our data centres, offices and everything in them is essential to the success of our business. That's why they take it so seriously.

Full details of CWCS Hosting's data centre can be found [here](#).

All traffic (transferral of files) between this website and your browser is encrypted and delivered over [HTTPS](#).

## **5.0 OUR THIRD PARTY DATA PROCESSORS**

We use a number of third parties to process personal data on our behalf. These third parties have been carefully chosen and all of them comply with the legislation set out in section 2. All 3 of these third parties are based in the USA and are [EU-U.S Privacy Shield](#) compliant.

- Google ([Privacy policy](#))

## **6.0 DATA BREACHES**

We will report any unlawful data breach of this website's database or the database(s) of any of our third party data processors to any and all relevant persons and authorities within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has been stolen.

## **7.0 DATA WE COLLECT FROM CUSTOMERS**

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, last name. Contact Data includes address, delivery address, email address and telephone numbers.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter with you for example, to provide you with goods or services. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## **7.1 HOW IS YOUR PERSONAL DATA COLLECTED?**

You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise.

## **7.2 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, generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message.

## **7.3 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.

## **8. DATA WE COLLECT DURING RECRUITMENT**

As part of any recruitment process, we collect and process personal data relating to job applicants. Westwood Landscape Ltd is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

We collect a range of information about you. This may include:

your name, address and contact details, including email address and telephone number, details of your qualifications, skills, experience and employment history whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process.

Information about your entitlement to work in the UK and equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief.

### **8.1. HOW IS YOUR PERSONAL DATA COLLECTED?**

We collect this information in a variety of ways. For example, data might be contained in application forms or CVs, obtained from your passport or other identity documents, or collected through interviews.

We will also collect personal data about you from third parties, such as references supplied by former employers.

Data will be stored in a range of different places including payroll systems, in HR management systems and on other IT systems (including email).

### **8.2. HOW WE USE YOUR PERSONAL DATA**

We need to process data to take steps at your request prior to entering into a contract with you. We also need to process your data to enter into a contract with you. In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, we are required to check a successful applicant's eligibility to work in the UK before employment starts.

We may also need to process data from job applicants to respond to and defend against legal claims.

Where we rely on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

Where we process other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes.

For some roles, we are obliged to seek information about criminal convictions and offences. Where the organisation seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, we will keep your personal data on file in case there are future employment opportunities for which you may be suited and you are free to withdraw your consent at any time.

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the management team, interviewers involved in the recruitment process, managers in the business area with a vacancy.

We will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. The organisation will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks.

You are under no statutory or contractual obligation to provide data to the organisation during the recruitment process. However, if you do not provide the information, the organisation may not be able to process your application properly or at all.

#### **If you fail to provide personal data**

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

### **8.3. HOW LONG WILL WE USE YOUR 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, payroll or reporting requirements.

### **9. DATA CONTROLLER**

The data controller of this website is: Westwood Landscape Ltd, a UK Private limited Company with company number: 10582018

Whose registered office is:

Orton Grange

Carlisle

Cumbria

CA5 6LB

And whose operating office is the same:

### **10.0 PRIVACY COMPLIANCE MANAGER**

Mrs Helen Houghton, Director

Westwood Landscape Ltd

Telephone: 01228 712123

Email: [helen.houghton@westwoodlandscape.co.uk](mailto:helen.houghton@westwoodlandscape.co.uk)

### **11.0 CHANGES TO OUR PRIVACY POLICY**

This privacy policy may change from time to time in line with legislation or industry developments. We will not explicitly inform our clients or website users of these changes. Instead, we recommend that you check this page occasionally for any policy changes. Specific policy changes and updates are mentioned in the change log below.

#### **11.1 Change log**

16/01/20

20/9/23