

## Privacy Policy

This privacy notice aims to give you information on how Avantgarde FM collects and processes your personal data, including any data you may provide through our website when you sign up to a newsletter or procure our services.

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.

### Controller

Company Name is the controller and responsible for your personal data (collectively referred to as ["COMPANY"], "we", "us" or "our" in this privacy notice).

If you have any questions about this privacy notice, please contact us using the details set out below.

### Contact details

Avantgarde FM

Email address: [info@avantgardefm.com](mailto:info@avantgardefm.com)

Postal address: 65-81 Townsend Street, Port Dundas, Glasgow, G4 0LA

Telephone number: 0845 12 13 999

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](http://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.

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

Although this privacy notice sets your main rights under the new laws effective from 25 May 2018, we may need to make changes to it from time to time as new guidance is issued from the Information Commissioner's Office and the government.

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

### Third-party links

Our 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 our website, we encourage you to read the privacy notice of every website you visit.

### 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 follows:

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- Identity Data includes names, company name, job title and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of products / services you have purchased from us.
- Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.

We may 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.

### 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, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- Enquire about Company Name products & Services;
- Use our website;
- Subscribe to our publications;
- Request marketing to be sent to you;
- Give us some feedback.
- Third parties or publicly available sources.

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 have your consent
- 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 and where your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

You have the right to withdraw consent to marketing at any time by contacting us [info@v-360.co.uk](mailto:info@v-360.co.uk)

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Purposes for which we will use your personal data

We have set out below details of the ways in which we may use your data and the bases for doing so.

1. To register you as a new customer
2. To process or set up your order, including managing payments, fees & charges and to collect and recover money owed to us
3. To manage our relationship with, which includes notifying you about changes to our terms or privacy policy
4. Asking you for feedback or to take a survey
5. To invite you to take part in corporate events (E.g., Golf Day)

### Marketing

We will try to provide you with choices about certain uses of your information, especially when it comes to marketing and advertising. You can always change your mind about receiving marketing information.

### Marketing Mailing List:

Avantgarde FM use MailChimp to store our Marketing mailing list. This data is securely stored by Mailchimp in the USA. MailChimp have amended their processes to comply with GDPR.

### 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.

### Disclosures of your personal data

We may have to share your personal data with the parties set out below:

- External third parties such as service providers, professional advisers, HM Revenue & Customs, regulators and other authorities
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

### Data security

We have put in place 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. 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.

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### 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.

### Your legal rights

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

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

### Glossary

Legitimate Interest means Company Name interest in conducting and managing our business to enable us to give you the best service and products 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 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.

Object to processing of your personal data where we are relying on a legitimate interest 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.

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Request restriction of processing of your personal data.

Request the transfer of your personal data to you or to a third party.

Withdraw consent at any time where we are relying on consent to process your personal data.