



PRIVACY POLICY

1. INTRODUCTION

This privacy notice provides you with details of how we collect and process your personal data through your use of our website and services. Atria are the data controller, for all data provided to us as a result of direct communication from customers / clients wishing to enquire or utilize our services, and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

Atria will process Personal Data as necessary to perform the Data Processing Services and as further instructed by the Customer / Client in its use of the Services, who in these instances are the Data Controller.

We have appointed a Data Protection Officer who oversees privacy related matters for us. If you have any questions about this privacy notice, please contact the Data Protection Officer using the details set out below or email: dpo@weareatria.com.

2. WHO WE ARE

Our full details are:

Agena Solutions Limited T/A Atria Company Registration Number 06496884

Email address: info@weareatria.com

Registered office address: 49 Station Road, Polegate, BN26 6EA.

We are registered as a Data Controller with the Information Commissioners Office and our reference number is Z2270603.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at: dpo@weareatria.com

3. THE DATA THAT WE COLLECT ABOUT YOU

Personal data means any information capable of identifying an individual. It does not include anonymised data. We may process the following categories of personal data about you:

Communication Data: that includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance, or defence of legal claims. Our lawful ground for this processing is our legitimate interests, which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.

Customer / Client Data: that includes data relating to any purchases of goods and / or services such as name, title, billing address, delivery address, email address, phone number, contact details, purchase details and bank and / or card details. We process this data to supply the goods and / or services you have purchased, and to keep records of such transactions. Our lawful ground for this processing is the performance of a contract between you and us and / or taking steps at your request to enter such a contract.

Personal Data: that includes data submitted by a Customer / Client into a system / application of Atria, the extent of which is determined and controlled by the client in its sole discretion. Atria will process that personal data as necessary to perform the Data Processing Services and as further instructed by the Customer / Client as a Data Controller. The data types that a Customer / Client may submit include, but is not limited to First name, Last name, Address and Postcode, Contact Information (Telephone / Mobile Number, E-Mail address), Images, Vehicle Registration Number. Our lawful ground for this processing is the performance of a contract between our Customer / Client and ourselves. Our lawful ground of processing is our legitimate interest.

User Data: that includes data about how you use our website and any online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back- ups of our website and / or databases and to enable publication and administration of our website, other online services, and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.

Technical Data: that includes data about your use of our website and online services such as your IP address, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business.

Sensitive Data: We do not collect any Sensitive Data about a client / customer. Sensitive Data refers to data that 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. We do not collect information about criminal convictions and offences.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

We may process your personal data without your knowledge or consent where this is required or permitted by law. We do not carry out automated decision-making or any type of automated profiling.

4. COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see the Atria Cookie Policy.

5. DISCLOSURE OF PERSONAL DATA

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

- Service providers who provide IT and system administration and mail services
- Professional advisers including lawyers, bankers, and auditors
- Regulatory bodies that require us to report processing activities
- Law Enforcement Agencies (i.e., The Police and other security organisations as required in the detection and prevention of a crime).

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

We do not transfer your personal data outside the UK.

6. DATA SECURITY

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions, and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

7. DATA RETENTION

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, contractual, accounting, or reporting requirements.

When deciding what the correct time is to keep the data for, we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

Data provided to us from a client / customer will be retained in line with the Data Controllers data retention periods.

8. YOUR LEGAL RIGHTS

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can see more about these rights at: <https://ico.org.uk/individual-rights>

If you wish to exercise any of the rights set out above, please email us at: dpo@weareatria.com

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 or refuse to comply with your request in these circumstances.

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.

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.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you. If you have any queries our email address is: dpo@weareatria.com

9. UPDATES TO THIS PRIVACY POLICY

Atria recognise that transparency is an ongoing responsibility so we will keep this privacy policy under regular review. This policy was last updated on 1st September 2021.