



PRIVACY POLICY

NEURO SYSTEMS LTD.
PRIVACY POLICY STATEMENT

Version 1
Date: **30/10/2018**

Uncontrolled if Printed

1. EXECUTIVE SUMMARY

Neuro Systems understands that your privacy is important, and that you care about how your personal data is used, shared and stored online. We respect your privacy and are committed to protecting your personal data when you visit our website www.nslfire.co.uk (“Our Site”) and will only collect and use personal data in the ways that are outlined within this policy, and in a manner that is consistent with our obligations and your privacy rights under the law.

Please read this Privacy Policy thoroughly, ensuring that you completely understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site, and You will be required to read and accept this Privacy Policy when signing up for an Account. If you do not accept and agree with this Privacy Policy, you must stop using Our Site instantly.

2. DEFINITIONS AND TERMINOLOGY

In this Policy, the below terms have the subsequent meanings:

“Account”	means an account required to access and/or use certain areas and features of Our Site;
“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 14, below;
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
“Personal Data”	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”); and
“We/Us/Our”	means Neuro Systems Ltd., a limited company registered in England under company number 04037335, whose registered address is 7 Amber Trading Estate, Artic Way, Kimberley, Nottingham NG16 2HS.

3. INFORMATION ABOUT WHO WE ARE

1. Our Site is owned and operated by Neuro Systems Ltd., a limited company registered in England under company number 04037335, whose registered address is 7 Amber Trading Estate, Artic Way, Kimberley, Nottingham NG16 2HS.
2. Our VAT number is 746157518
3. Our nominated Data Protection Rep is Beverly McCartney, and can be contacted by telephone on 0115 9384 782, by email on Beverly.mccartney@nslfire.co.uk or by post at 7 Amber Trading Estate, Artic Way, Kimberley, Nottingham NG16 2HS.

4. WHAT DOES THIS POLICY COVER?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites, and We recommend you to check the privacy policies of any such websites before providing any of your personal data to them. We do not accept liability for the use of your personal data on third party websites.

5. YOUR RIGHTS

You have the following rights under the General Data Protection Regulation (GDPR), which this Policy and Our use of personal data have been created to uphold:

1. The right to be Informed about Our collection and use of personal data;
2. The right of Access to the personal data We hold about you (see section 12);
3. The right to Rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in Section 14);
4. The right to Erasure (to be forgotten) – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, explained in section 7 but if you would like Us to delete it sooner, please contact Us using the details in Section 14);
5. The right to Restrict (i.e. prevent) the processing of your personal data;
6. The right to Data Portability (obtaining a copy of your personal data to re-use with another service or organisation);
7. The right to Object to us using your personal data for particular purposes; and Rights with respect to automated decision making and profiling

If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in Section 14 and We will endeavour to do our best to resolve the problem for you. If We are unable to help, you also have the right to file a complaint with the UK's supervisory authority, the Information Commissioner's Office.

For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

6. THE DATA WE COLLECT

Depending upon your use of our Site, we may collect some or all of the following personal and non-personal data (please also see Section 14 on Our use of Cookies and similar technologies):

1. Name;
2. Business/Company Name;
3. Job title;
4. Profession;
5. Contact information; email addresses, telephone numbers;
6. Demographic information; business/personal address, postcode;
7. Financial information such as credit / debit card numbers;
8. IP address;
9. Web browser type and version;
10. Operating system;
11. a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to;

7. HOW DO WE USE YOUR DATA?

All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 9, below.

Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, we may use your data for the following purposes:

1. Providing and managing your Account;
2. Providing and managing your access to our Site;
3. Personalising and tailoring your experience on Our Site;
4. Supplying Our products and/or services to you (please note that We require your personal data in order to enter into a contract with you);
5. Personalising and tailoring Our products and/or services for you;
6. Replying to emails from you;

7. Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by following the instructions included with the email);
8. Market research;
9. Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience;

With your permission and/or where permitted by law, we may also use your data for marketing purposes which may include contacting you by email and/or telephone and/or post with information and/or social media contact, news and offers on Our products and/or services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

Third parties whose content appears on Our Site may use third party Cookies, as detailed below in section 13. Please refer to this section for more information on controlling Cookies. Please note that We do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.

You have the right to withdraw your consent to us using your personal data at any time, and to request that We delete it.

We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):

1. for as long as the personal data relates to you as an active client and for a period of 3 years thereafter;
2. for a period of three years following your last response to or engagement with a communication of a business nature;

8. HOW AND WHERE DO WE STORE YOUR DATA?

1. We only keep your personal data for as long as We require in order to use it as outlined above in section 7, and/or for as long as We obtain your permission to keep it.
2. All of your data is stored within the United Kingdom. You are deemed to accept and agree to this by using Our Site and submitting information to us.
3. Data security is of the utmost importance to us, and to protect your data We have taken suitable measures to safeguard and secure the data collected through our Site.

9. DO WE SHARE YOUR DATA?

We contract with third parties to supply products and services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, and marketing. In certain cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.

We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

10. HOW DO WE CONTROL YOUR DATA?

As we set the rules and reasons for collecting data from you, we are classed as the Controller of your personal data. This means it is our responsibility to ensure that the data we collect is controlled effectively and protected at all times.

When submitting your personal data to us you have the right to restrict how we use your data. We aim to give you as much control over your own data as possible. When supplying data, you will be given the option to positively opt-in to occasionally receiving marketing content from us, once you choose to opt-in you may also unsubscribe at any time following the links provided within our emails.

11. YOUR RIGHT TO WITHHOLD INFORMATION

1. You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.
2. You may restrict Our use of Cookies. For more information, see section 13.

12. HOW CAN YOU ACCESS YOUR DATA?

You have the right to ask for a copy of any of your personal data held by us. Under the GDPR, no fee is payable and we will provide any and all information in response to your request. Please contact us for more information, our details can be found below in section 14.

13. OUR USE OF COOKIES

1. Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our products and/or services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.
2. By using Our Site you may also receive certain third-party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. Third party Cookies are used on Our Site for purposes such as analytics and advertising services. For more details, please refer to section 7, above. These Cookies are not integral to the functioning of Our Site and your use and experience of Our Site will not be impaired by refusing consent to them.
3. All Cookies used by and on Our Site are used in accordance with current Cookie Law.
4. By using Our Site, Cookies will be placed on your computer or device, you will be shown a prompt, confirming your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.
5. Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

6. The following Cookies, may be placed on your device:

File Name	Origin	Description
_cfduid	Cloudflare	The cfduid cookie is used to identify individual clients behind a shared IP address and apply security settings on a per-client basis. It does not correspond to any user ID in your web application, and does not store any personally identifiable information.
_gat	Google Analytics	This cookie does not store any user information, it's just used to limit the number of requests that have to be made to doubleclick.net
_ga	Google Analytics	Used to distinguish users for website analytics data
_gid	Google Analytics	Used to distinguish users for website analytics data
BIGipServerZebedee	Website	Expires on leaving the site, used for managing sessions on load balanced servers, to ensure user requests are routed consistently to the correct server
TS01237438		
PHPSESSID	Website	Used by the web server to keep track of sessions. This allows the website to differentiate users for functions such as remembering basket contents between page loads. This cookie simply contains a unique key and not the session data itself, which is stored on the server.

7. Our Site uses analytics services provided by Google. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This information enables Us to improve Our Site and the products and/or services offered through it. You do not have to allow Us to use these Cookies, however it's important to note, whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more effective experience for you.

8. The analytics service used by Our Site uses Cookies to gather the required information

9. You may decide to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

14. CONTACTING US

If you have any questions about Our Site or this Privacy Policy, please contact us by telephone on 0115 9384 782, by email on Beverley.mccartney@nslfire.co.uk or by post at 7 Amber Trading Estate, Artic Way, Kimberley, Nottingham NG16 2HS.

15. CHANGES TO OUR PRIVACY POLICY

We may change this Privacy Policy (for example, due to changes in the law). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to ensure you're up-to-date