

BACKGROUND:

DEV4 ONLINE LTD, a company incorporated in Scotland (Registered number SC204078) and having its Registered Office in Scotland ("**we/us/our**") understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, <https://dev4.online> ("**Our Site**") and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. You will be required to read and accept this Privacy Policy. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

1. DEFINITIONS AND INTERPRETATION

In this Policy the following terms shall have the following meanings:

"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 Part 14, below; and
"Cookie Law"	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

2. INFORMATION ABOUT US

- 1.1 Our VAT number is 926 0166 38
- 1.2 Our Data Protection Officer is G Henderson, and can be contacted by via the contact form on our website.

3. WHAT DOES THIS POLICY COVER?

This Privacy Policy applies only to your use of Our Site.

4. WHAT IS PERSONAL DATA?

Personal data is defined by the General Data Protection Regulation (Regulation (EU) 2016/679) (the "**EU GDPR**") where applicable in relation to the storage retention and processing of EU personal data, the retained EU law version of the EU GDPR (UK GDPR) as it forms part of the law of England and Wales, Scotland, and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 and the

Data Protection Act 2018 (collectively, “**the Data Protection Legislation**”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. WHAT ARE MY RIGHTS?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner’s Office.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office. We would welcome the opportunity to resolve your concerns ourselves however, so please contact us first, using the details in Part 15.

6. WHAT DATA DO YOU COLLECT AND HOW?

Depending upon your use of Our Site we collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. Please also see Part 14 for more information about our use of Cookies and similar technologies. We do not collect any 'special category' or 'sensitive' personal data, personal data relating to children or data relating to criminal convictions and/or offences.

Data Collected	How We Collect the Data
Identity Information including Name and email address.	Via our contact form if you choose to send us this information
Anonymised activity data using Google Analytics	Using Google Analytics to identify general locations (i.e. the town) when a user accesses our website and time spent on each page.

7. HOW DO YOU USE MY PERSONAL DATA?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we will use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Communicating with you.	Your email address if you have chosen to send it to us	Your specific request to contact us for information via our website contact page
Analyse general activity on the website	Anonymised activity data using Google Analytics	Specific data regarding computers or individuals is not collected. Any analytics data is general and high level. E.g. we may see the town or city where the website was accessed but not the address.

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 with information, news and offers on Our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with

our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 15.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

8. HOW LONG WILL YOU KEEP MY PERSONAL DATA?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Contact information including name and email address.	6 Months

9. HOW AND WHERE DO YOU STORE OR TRANSFER MY PERSONAL DATA?

We will only store your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so;

10. DO YOU SHARE MY PERSONAL DATA?

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may share your personal data with other companies in our group for administrative and company management purposes. This includes subsidiaries.

11. HOW CAN I CONTROL MY PERSONAL DATA?

- a) In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Site, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails.
- b) You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

12. CAN I WITHHOLD INFORMATION?

You may be able to access certain parts of Our Site without providing any personal data at all. However, to use all features and functions available you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Part 14.

13. HOW CAN I ACCESS MY PERSONAL DATA?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

14. HOW DO YOU USE COOKIES?

Parts of 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. 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.

All Cookies used by and on Our Site are used in accordance with current Cookie Law.

If cookies are in place at the time of your using our site then a Cookie pop up will appear offering you the choice to include or exclude the cookies.

First party:

Name of Cookie	Purpose	Essential?
CookieConsent	To identify if user has given permission for us to use third party cookies for google analytics	Yes

The following third-party cookies may be placed on your computer or device:

Name of Cookie	Provider	Purpose
ARRAffinity, ARRAffinitySameSite	Microsoft Azure	Set by the hosting platform and is essential for the successful running of the application on a browser

_ga	Google Analytics	Optional third party cookies set by Google Analytics, only set if user agrees
_greaptcha	ReCaptcha	Essential for establishing if a user is authentic when using the websites contact form (i.e. not a robot).

15. HOW DO I CONTACT YOU?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please contact us through our website contact page.

16. CHANGES TO THIS PRIVACY POLICY

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted in this page 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 keep up-to-date. This Privacy Policy was last updated on 1 July 2023.