

# Privacy Policy

## Version Control

Version Number	Comments	Owner	Date
1.04	Updated	COO	February 2022
1.04	Review	COO	February 2023
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Next Review Date: February 2024

The following data privacy notice explains the circumstances in which we will collect personal data from you, why it is being collected, how we will use it and to whom we might disclose it to if necessary.

## The data controller

Firefly Online Ltd is committed to complying with the UK's Data Protection law and the EU General Data Protection Regulation (GDPR) for the protection of personal data, as well as the principles of data security in the configuration of our services. If you have any questions about this privacy notice or how we use your personal data, please contact [data.protection@firefly-online.net](mailto:data.protection@firefly-online.net)

In Writing: Firefly Online Ltd, PO Box 11248, Grantham, NG31 0NB

By Phone: 0800 197 6958

By Email: [data.protection@firefly-online.net](mailto:data.protection@firefly-online.net)

## What data is being collected and processed?

In order to enter into an agreement with Firefly Online Ltd we will collect, store and use elements of your personal data. The processing of this personal data is a contractual requirement and is necessary by Firefly Online Ltd in order to administer your account and to provide the products and services you have requested from us.

When you approach Firefly Online Ltd, we will ask your consent to collect and process your personal data. Failure to provide this consent and/or personal data may mean we will be unable to execute the contract and will result in termination of our services.

When engaging Firefly Online Ltd, you will usually need to disclose to us the following:

- Title
- First name
- Surname
- Company name
- Address (street, street number, postal code, city and country/region)
- Email address
- Company Telephone and mobile number (optional)

We may also monitor, record, store and use any telephone, email or other electronic communications with you for training purposes so that we can check any instructions given to us and to improve the quality of our customer service.

Any personal data we collect from you will not be transferred outside the European Economic Area.

## Website Cookies

When you access our website, temporary data about your visit is stored and processed in a protocol file for a certain period of time via the use of cookies. This information is anonymised and is used by us to better understand the use of our site, including the number of visitors we have, the pages viewed per session and time exposed to particular pages. This in turn helps us to provide you with a better experience, since we can evaluate the level of interest in the content of our website and tailor it accordingly.

The following data is collected and stored until its automated deletion:

- IP address of the accessing computer/device
- Date, time and duration of your visit
- Name and URL of the accessed pages
- Identification data of the browser and operating system used
- Website from which the data was accessed
- Name of your internet access provider

The nature and content of the information collected via cookies differs, as does the period for which this information is retained. In line with our data protection obligations, we will ensure that this retention period is not excessive, and that the data is only retained for as long as is necessary for the purpose for which it was collected.

If you wish to know more, or if you wish to identify the exact retention periods, please contact our data protection officer:

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The data listed above is only analysed for statistical purposes and for improving our internet presence, then it is deleted. We will not attempt to personally identify you from your IP address unless required to as a matter of law or regulation or in order to protect our, or our other customers' rights.

Most browsers automatically accept cookies but you can set your browser options so that you will not receive cookies and you can also delete any existing cookies from your browser. Should you wish to opt out of Google Analytic tracking across all websites please visit: <http://tools.google.com/dlpage/gaoptout>. Please note, you may find that some parts of the site will not function properly if you refuse cookies.

## Direct Marketing Communications

If you have chosen to opt-in to our direct marketing communications, we will use your information to tell you about products and services available from us which may be of interest to you. We may also use your information to tell you about products and services which we can introduce from selected businesses.

To help make our emails more interesting and relevant, we often receive a confirmation when you open an email from Firefly Online Ltd if your computer supports such capabilities.

You have a right to opt-out of our direct marketing communications at any time. You can opt-out by following the Unsubscribe instructions at the bottom of the communication or by emailing

## Links to websites of other providers third parties

Please note that this data privacy notice only applies to Firefly Online Ltd and we are not responsible for, and have no control over, information that is submitted to or collected by third parties, such as those where our website may provide links and banner advertisements to third party sites. Since we do not control those websites, you are responsible for reviewing and abiding by the privacy policies of these third party sites to ensure they comply with the applicable data protection regulations.

## How long will the data be stored for?

Where possible, Firefly Online Ltd will take steps to erase any personal data that is no longer necessary for the purposes for which it is collected or otherwise processed, or if you have withdrawn consent for its processing and retention.

Under the GDPR, you have the right to 'block' or request the deletion or removal of personal data to prevent further processing. This right to erasure is also known as 'the right to be forgotten'. Specific circumstances in which you can request the deletion or removal of personal data includes:

- Where the personal data is no longer necessary for the purposes for which it is collected or otherwise processed
- Where you withdraw consent
- When you object to the processing and there is no overriding legitimate interest for continuing the processing
- Where the personal data was unlawfully processed (i.e. otherwise in breach of the GDPR)
- Where the personal data has to be erased in order to comply with a legal obligation
- In case a deletion is not possible due to legal, statutory or contractual retention periods, or if it requires disproportionate efforts or prejudices your legitimate interests, the data will be blocked instead of deleted.

## Sharing of data with other data controllers

Here at Firefly Online Ltd we take your privacy seriously and the information we hold about you is confidential. We will only disclose it outside Firefly Online Ltd when:

- you have given us your consent to do so
- it is necessary for the performance of an agreement of which you will be made aware
- in order to obtain professional advice (e.g. legal advice)
- we or others need to investigate or prevent crime (e.g. to fraud prevention agencies)
- the law permits or requires it
- regulatory or governmental body requests or requires it, even without your consent, or
- there is a duty to the public to reveal the information

In order to administer your contract, we may need to share some of your personal information with other data controllers. This processing is necessary for the purposes of delivering specific services to you. You agree that we can share or use your personal data with any of our appointed agents or suppliers to allow us to provide you services and products you have asked us to provide you under this agreement.

## Fraud Prevention

If you give us false or inaccurate information and fraud (in any form) is identified, details will be passed to the fraud prevention agencies. We and other organisations may also share, access and use this information to prevent fraud and money laundering, for example when:

- checking details on applications for credit and credit related or other facilities
- managing credit and credit related accounts or facilities
- recovering debt
- checking details on proposals and claims for all types of insurance
- checking details of job applicants and employees

In addition, law enforcement agencies may access and use this information.

## Protecting your privacy

In order to protect the personal data collected from you by Firefly Online Ltd against accidental or deliberate manipulation, loss, destruction or the access of unauthorised persons, technical and organisational security measures are constantly improved as part of our technological development. In addition, our employees, subcontractors and other support staff are obligated to observe confidentiality and data privacy.

In order to operate our business we use multiple systems. When our staff interact with these systems the data is transmitted over computer networks using a computer protocol called HTTP, which is a global adopted standard. To protect this data as it is transferred between the staff computer and the systems we enforce the use of HTTPS, which uses secondary protocols and ciphers SSL and TLS to encrypt the data during transit. This is a global recognised way of protecting data in transit which is an industry standard and is used by millions of websites in the protection of their online transactions with their customers.

Wherever possible, we have tried to create a secure and reliable website for our users. However, you recognise that your use of the Internet and our website is entirely at your own risk and we have no responsibility or liability for the security of personal information transmitted via the Internet.

All passwords and usernames allocated to you must be kept secret and must not be disclosed to anyone without our prior written authorisation. You must not use any false identity in email or other network communications and you must not attempt or participate in the unauthorised entry or viewing of another user's account or into another system.

You must not use the services and/or network systems or any part thereof for fraudulent activities, or to breach another organisation's security (cross-network hacking). This is an illegal act and prosecution under criminal law may result. You must not use any computers, computer equipment, network resources or any services provided by us for any illegal purpose, or for accessing, receiving or transmitting any material deemed illegal, indecent, offensive or otherwise unacceptable under UK law.

We will monitor network traffic from time to time for the purposes of backup and problem solving and in order to ensure that you are not misusing any of the services provided to you.

## **Breaches**

If at any time we become aware that your data has been compromised, or that a breach of our systems and controls has occurred, which has an impact on the security of your data, we will notify the Information Commissioner's Office, and you, without undue delay.

## **Subject Access Requests**

You have the right to request access to a copy of the personal information that we hold about you. This is also known as a 'Subject Access Request'. This information is provided to you free of charge however, we can refuse to respond or charge a 'reasonable fee' of £10 inc. VAT when a request is manifestly unfounded, excessive or repetitive.

We will provide this information in a structured, commonly used and machine readable form such as a CSV file. This allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.

If you would like to submit a Subject Access Request, please contact our Data Protection Officer in writing to:

In Writing: Firefly Online Ltd, PO Box 11248, Grantham, NG31 0NB

By Email: [data.protection@firefly-online.net](mailto:data.protection@firefly-online.net)

We will response to your request without delay and at the latest, within one month of receipt of your request.

## Rectifying or updating personal data

If you believe the personal data we hold about you is inaccurate or incomplete, you have the right to rectification. You can let us know about any changes to your personal data. Where possible, we will also inform any third parties to whom we have disclosed the personal data in question to so they can rectify their records. We will typically respond to your request within one month, although this can be extended by two months if your request for rectification is complex.

## Withdrawing Consent

You have the right to withdraw your consent for us to collect, process and store your data at any time. If you wish to withdraw your consent, please confirm this in writing to our Data Protection Officer:

In Writing: Firefly Online Ltd, PO Box 11248, Grantham, NG31 0NB

By Email: [data.protection@firefly-online.net](mailto:data.protection@firefly-online.net)

Please note, by withdrawing consent, Firefly Online Ltd may be unable to execute the contract that you have entered into with us and will result in termination of our services. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

## Right to complain

If you have a complaint about any aspect of data protection or if you feel your privacy has been breached by us, we would like to hear from you. To help us investigate and resolve your concerns as quickly as possible, please contact our Data Protection Officer:

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By Email: [data.protection@firefly-online.net](mailto:data.protection@firefly-online.net)

If you are unhappy with the final response you have received from Firefly Online Ltd, you have the right to complain to the Information Commissioner's Office (ICO) within three months of your last meaningful contact with us. You can call the ICO on 0303 123 1113 or by visiting their website: <https://ico.org.uk/>.

## Changes to the Privacy Policy

Due to the further development of our website, government regulations or the implementations of new technologies, this policy will be reviewed, and may change, from time to time Firefly Online Ltd reserves the right to change this data protection information at any time with effect for the future. The revised policy will be posted to this page so that you are always aware of the information we collect, how we use it and under what circumstances we disclose it. We therefore recommend you read the current data protection information again from time to time.