



## **HIGHWIRE LTD: Data Collection and Privacy Policy**

**MAY 2018**

*HIGHWIRE LTD* is the data controller collects and uses personal data as follows:

*HIGHWIRE LTD* has undertaken a Legitimate Interest Assessment and concluded that personal data is collected for a specific purpose for which we have a legitimate interest. We use your data in ways you would reasonably expect mainly providing you with relevant information regarding our products and services. Your data is processed in a way that is lawful, fair and transparent.

We will respond to any enquiries that you make regarding your personal data that we may we hold. You have the right to know exactly what information is held and how it is used.

You have the right to your data being erased known as 'the right to be forgotten', with your personal data being removed without the need for a specific reason as to why you wish it so.

We never collect sensitive data, for example, regarding health, sexual orientation, religious or political views, genetic data, or ethnicity and sexual preference.

The data we hold is accurate, kept up to date and held on a secure IT system. We do not use your personal data in an automated decision-making process. Data is not transferred outside of the EU.

To contact us regarding your personal data please email [enquiries@highwire.info](mailto:enquiries@highwire.info) or call 0161 612 7633

### **Use of Cookies**

Our Web Site – [www.highwireltd.co.uk](http://www.highwireltd.co.uk) uses cookies to improve the user-friendliness and functionality of our website. By using our website, you consent to our use of cookies.

1. A cookie is a file which is placed on your computer or other IT-equipment and which makes it possible to anonymously record what actions users make on our site.
2. Cookies often also ensure our site works correctly and some functions will not work without the use of cookies.
3. *HIGHWIRE LTD* uses cookies to optimise your visit to this website when browsing.
4. *HIGHWIRE LTD* uses third party cookies from widely used analytics systems to generate statistics on the use of the website and from anonymous tracking software to recognise IT-equipment and to track how often you visit the website.
5. Cookies cannot be used to identify individuals. *HIGHWIRE LTD* does not disclose the gathered information to anyone else.

6. Cookies can be disabled by changing your browser settings and deleting the cookies that are already on your PC. Note, however, that there may be web pages or features you will then be unable to see or use.

At any times you may opt out of *HIGHWIRE LTD* supplying you with relevant information regarding our products and services.

### **Data Protection Impact Assessment**

We have examined the data we do collect and process and have determined that this collection and processing will not result in a high risk to the rights and freedoms of natural persons. The potential vulnerabilities of our current software systems are dealt with by password protection.

We do not collect data

- That is sensitive data or of a highly personal nature.
- Concerning vulnerable data subjects.
- To be processed on a large-scale.
- From systematic monitoring.
- Used for profiling or scoring.
- No data is transferred out of the EU

Therefore, we will not be conducting a Data Processing Impact Assessment. This policy will be reviewed on an annual basis, or on the introduction of new software or technology.