

# DLB Privacy Policy

At Etive Technologies Limited (Etive), which operates Digital Log Book, (DLB), we are committed to protecting the privacy of our customers and the responsible management of personal information in accordance with Data Protection Laws.

Data Protection Laws includes but not limited to the Data Protection Act 2018 and the General Data Protection Regulation (GDPR). Our relationship with you is valuable and we understand the importance you place on the privacy and security of information which personally identifies you. In that respect, and whether you are a first-time visitor to our website or a regular user of your DLB, we take your privacy seriously. Please read the following in order to learn more about our privacy policy and our information gathering and dissemination practices.

For the purposes of Data Protection Law we are the controller in relation to the personal data of visitors to our website; in relation to personal data held in the DLB, the local authority of the area in which you live, for example, is the controller and we are the processor. You can contact us at 20 Westfield Avenue, Edinburgh, EH11 2TT or email us at [support@digitallogbook.org](mailto:support@digitallogbook.org) or call us on 0845 612 0205.

Please note that when you subscribe to our service and accept our online "Membership Terms and Conditions", by doing so you will be accepting the terms of this Privacy Policy (the terms of which are incorporated by reference into our "Membership Terms and Conditions").

## Why we require your information

When you use Digital Log Book (DLB) in accordance with Data Protection Laws, processing is necessary for the performance of the contract between us. Similarly, we will process personal data in order to take steps at your request prior to entering into a contract with us so that we can provide the DLB to you. As part of the service we will process personal data for compliance with our legal obligations including, the prevention and detection of fraud. Where we process special category data we will process it in accordance with the explicit consent that we have requested from you.

The DLB is designed to help citizens achieve an assured identity, a legal standard of identity. [GOV.UK Verify](#) enables you to prove who you once and reuse your credentials enabling you to access a range of approved services. It is not a digital identity card. It makes signing into services safer, quicker and easier. By accepting these terms, you consent to us providing your information to the organisations authorised by GOV.UK Verify to obtain an assured identity on your behalf.

DLB provides a variety of on-line services, including an online enquiry form which collects personal data when you register and when you use the services. We use your personal data to provide those services, including putting local authority information that may be relevant to you and your family into your DLB and letting you know that we have done so.

If you are a visitor to our site without a DLB, we use your personal information in order to customise the content you see on our pages and to fulfil your request for certain products and services. Unless you have specifically requested that we do not do so, we may share your data with our partners who work with us to provide DLB services. If you opt out of sharing your personal data with us or our partners, we may not be able to provide you with the services you have requested.

You may interact with other people's services through our website and the DLB. Those third parties may have their own privacy policies that govern how they use information provided by you.



# DLB Privacy Policy

You do not need to provide us with personal data simply to browse our website (although see the paragraph headed 'website usage data').

## What information do we collect?

We will collect information from you in the following circumstances:

### Enquiry Form

Our enquiry form involves providing us with your name, address, telephone and mobile number and e-mail address. We use this information to provide you with the service you have requested or to answer your queries.

### Registration Details

When you register for a Digital Log Book, we will require your personal data. For example; your name, age, your gender, number of dependents and National Insurance number so that you receive the services you require.

### Information Provided By You

You can give us information about you by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our on-line services, subscribe to our services, search for a product, place an order on our site, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, report issues to your landlord or local authority, access external job boards or applying to higher education institutions and when you report a problem with our site.

### Specific and Optional Information

#### Specific / Required Information

We may request specific information from you on our registration forms. Where you choose not to provide the requested specific or required information we will either not be able to provide the services you have requested, or the provision of those services could be negatively affected.

#### **Optional Information**

We can request optional information from you on our registration forms. We request this optional information so that we can serve you better e.g. to provide more tailored services and so that we can understand our customers better e.g. through internal research, data analysis, market research and product research. If we request this additional information from you we will identify it as optional.

### Special category data

Where you subscribe to Digital Log Book certain information that you can choose to enter into your Digital Log Book is 'special category data' such as information on your ethnic background and the state of your health. Local authorities, housing associations, social landlords, public bodies can require this information so that they are able to deliver their services to you. As part of the services of the Digital Log Book, if you do not consent to the processing of sensitive data, then some parts of the Digital Log Book cannot function fully.



# DLB Privacy Policy

## Job Opportunities

We may advertise details of job opportunities with Etive on our website. If you apply for one of the available positions you are required to provide us with contact details in order that we can get in touch with you. These details, together with the contents of your curriculum vitae, will be treated as confidential and will only be used for the purposes of considering you for a particular position.

By completing our job application form you expressly consent to our processing your information in connection with your application. If you prefer not to send the application by the Internet you can print it out and post it to us at Etive Technologies Ltd, 20 Westfield Avenue, Edinburgh, EH11 2TT, UK.

## Website Usage Data

With or without cookies, our website keeps track of usage data, such as the source address that the page request is coming from i.e. your IP address, domain name, date and time of the page request, the referring website if any and other parameters in the URL e.g. search criteria. We and our key strategic partners use this data to better understand website usage so we know what areas of our website users prefer. This information is stored in log files and is used to administer the site, for troubleshooting, data analysis, testing, research, and for aggregated and statistical reporting but is not attributed to you as an individual.

## Information we receive from other sources

We can receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies and can receive information about you from them.

We can combine this information with information you give to us and information we collect about you. We can use this information and the combined information for the purposes set out in this Privacy Policy depending on the types of information we receive.

## Security

We recognise industry standards and employ security safeguards to protect information from unauthorised access and misuse. We use the most accurate and current information you provide in order to process your request. Etive is registered under the Data Protection Act 1998, registration number Z2859330, is Cyber Essentials Certified QGCE1132, is a member of the Cyber Security Information Sharing Partnership and is a group member of the Scottish Cyber Information Network.

## What information do we share?

We have a number of strategic partners who we work with and may share your information with to help enhance your DLB experience. We do not sell or rent your personal information to others. See further information in Strategic Partners.

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006. In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.



# DLB Privacy Policy

We will send personally identifiable information about you to other companies or people in the following additional situations;

## Strategic Partners

In a number of instances our Digital Log Book Service is made available in conjunction with a variety of organisations and their affiliates, such as local authorities, social landlords, housing associations, government departments such as DWP, or sponsors or other strategic partners, who wish to make our Digital Log Book service available to their members, customers, staff and/or affiliates. In such instances, if you are a member, customer, member of staff or affiliate of such an organisation (or one of their affiliates) then your personal data will be accessible by these organisations (and their affiliates). The Strategic Partners are all based in the United Kingdom.

As part of your use of the DLB or as part of subscribing to any of our products and/or services, these organisations will have the opportunity to contact you and we will work with these organisations to help ensure that this is a welcomed initiative rather than a hindrance and that they respect any requests from customers and users to unsubscribe or opt-out. Where you receive products and/or services from another organisation, such organisations' terms and conditions apply and we have no control over and do not accept any liability or responsibility for the accuracy of the information provided to you by such organisations or displayed on such organisations' websites. If you are at any time dissatisfied with one of our strategic partners then we would like to know because we are committed to only working with strategic partners that share our commitment to responsible data management. Please contact us at [support@digitallogbook.org](mailto:support@digitallogbook.org).

## Data Analytics

Digital Log Book may share your information with analytics and search engine providers that assist us in the improvement and optimisation of our site. You can find further details in our Cookies Policy.

## Compliance with law

We may disclose your Personal Data (including special category data) to appropriate third parties including local authorities where we have a good faith belief that disclosure of such information is helpful or reasonably necessary: to (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our policies and agreements, including investigations of potential violations of such policies and agreements; (iii) investigate, detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues; (iv) establish or exercise our rights to defend against legal claims; (v) prevent harm to the rights, property or safety of us, others, yourself or any third party; or (vi) for the purpose of collaborating with: (a) other providers involved in the provision of services to you; (b) law enforcement agencies.

## International Data Transfers

We do not transfer data outside the European Economic Area (EEA).

## Where we store your personal data

Personal data is stored within the European Economic Area (EEA).



# DLB Privacy Policy

## Security

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you or where you have chosen a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## Your Rights Amend/update/rectify

Where your details are incorrect or require updating for example, your address has changed, then you will have the right to have your details amended. Where you have subscribed to our services you can update and amend your details in your DLB.

## Right to object to processing

You have the right to object to processing of your personal data which is based on legitimate interest, direct marketing purposes (see **Marketing**) or for scientific/historical research and statistics.

## Right to restrict processing

You have the right to restrict processing of your personal data. If you do not provide us with full, accurate and up to date information about your circumstances or opt to omit any information requested in your registration form, we may not be able to provide our services to you and your ability to access further services requested in your registration form may be delayed.

## Subject access

You have a right to ask us for information we may hold about you. This is free of charge and we aim to respond as quickly as possible. Whilst this service is usually free, where a request is deemed excessive we may charge a fee. We will also take steps to verify a request to ensure the correct information is given to the correct individual. Please contact us at [support@digitallogbook.org](mailto:support@digitallogbook.org) confirming your name, address and email address.

## Portability

You may ask us for a copy of your information in a readable format so that you can use it for your own purposes or with your permission to transfer the information we hold on you to a service provider.

## Right to erasure

In certain circumstance you may ask us to delete your personal data. For example, when we have stopped processing your personal data, where you no longer require our services or where you withdraw consent. We may retain a copy of your personal data to comply with a legal obligation; or for establishing, exercising or defending any legal claims.

## Marketing



# DLB Privacy Policy

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at [support@digitallogbook.org](mailto:support@digitallogbook.org). Where we have sent you marketing communications, you will be able to unsubscribe or opt-out of marketing at any time.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Where we rely on your consent to process personal data, you have the right to withdraw consent at any time.

We want you to be happy so please contact us at [support@digitallogbook.org](mailto:support@digitallogbook.org) to find out about your rights and how to exercise them.

## Retention policy

We may hold your personal data for as long as it is necessary to meet our obligations to you. Where you are a visitor to our site we will not keep your information for more than 90 days after your visit. Where you hold a Digital Log Book with us, you are able to delete any of your personal data from the DLB (or ask us to delete it) but we will otherwise store it for your lifetime. Where there is a statutory duty to keep personal data we will keep it as long as it is necessary for example, for the prevention and detection of fraud.

## Complaints

We want you to be happy with our services; should you have any concerns please contact us at [support@digitallogbook.org](mailto:support@digitallogbook.org).

You will also have the right to lodge a complaint with a supervisory authority. In accordance with Data Protection Laws, a data subject has the right to lodge a complaint with a supervisory authority in particular in the Member State of his or her habitual residence, place of work or of an alleged infringement of the GDPR. For the UK, this is the Information Commissioner's Office (ICO). You may find their details at <https://ico.org.uk/>

## Suggestions

If you have any questions or suggestions regarding this Privacy Policy, have any concerns about the practices of our websites or believe we are not properly adhering to our Privacy Policy please contact us at [support@digitallogbook.org](mailto:support@digitallogbook.org).

## Change of purpose

Where we intend to further process personal data for a purpose other than that for which the personal data was collected, we shall provide you prior to that further processing with information on that purpose and with any relevant further information.

## Changes to Privacy Statement

We may edit this Privacy Policy from time to time. If we make any changes we will notify you by posting a prominent announcement on our web pages or by directly contacting you through email. We also recommend that you review our Privacy Policy regularly.

**LAST UPDATED February 2019**

