

Privacy Policy

Who are SMLWRLD?

SMLWRLD (Small World Collaboration LTD) design and build intranets and sites for a variety of organisations. We are entrusted by clients to handle commercial and personal data in a secure and confidential manner. In this Policy, references to we, us, or our, are references to SMLWRLD.

If you have any questions about this Privacy Policy or regarding the processing of your personal data, or if you wish to exercise any of your rights under applicable data protection regulation, you may contact the Managing Director using any of the following means:

Telephone: +44 (0)20 7502 3591

9.30am – 5pm GMT, Monday to Friday (excluding UK public holidays)

Email: contact@smlwrld.io

Post: Attn: Privacy Officer

1 Clerkenwell Green

London, UK EC1R 0DE

Purpose of this Policy

The purpose of this Policy is to detail how we seek to protect personal data, and ensure that all SMLWRLD employees and consultants understand the rules governing their use of personal data to which they have access in the course of their work. Our aim is to ensure that all personal data processed by us is kept safe and always secured, and that the personal integrity is respected.

Furthermore, it is to provide individuals and organisations with transparency about our collection, usage, maintenance, storage and destruction of all personal information.

General Principles

We adhere to the following principles relating to the processing of personal information, which ensure that all personal information is to be:

- Processed lawfully, fairly and in a transparent manner
- Collected only for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed
- Accurate and, where necessary, kept up to date
- Not kept in a form which permits identification of Persons for longer than necessary for the purposes for which the information is processed
- Processed in a manner that ensures security using appropriate technical and organisational measures to protect against unlawful or unauthorised processing, and against accidental loss, destruction or damage
- Not transferred to other countries without appropriate safeguards being in place
- Made available to Persons, and Persons allowed to exercise certain rights in relation to their personal data.

What personal information do we collect?

We will only collect and use personal data about you that is necessary to provide you with the services that you have enrolled in. Personal information we may collect includes:

- name
- email address (personal and/or work)
- phone number
- photos
- employer
- place of employment
- profession, occupation or job title
- employee id/number
- geographical location (country only)
- credentials (passwords and similar security information used for authentication and account access)

For what purpose do we collect your personal information?

We will only collect and process personal data fairly, lawfully and for specified purposes. The information we collect depends on the nature of our relationship with you.

If you are an employee or have been provided access to a Company intranet built by SMLWORLD, we will collect and process your personal information in accordance with the Company requirements for the use of the intranet.

If you are using a site built by SMLWORLD for a Company, we will collect and process your personal information in accordance with the Company requirements for the use of the site.

If using our website, or another site built by SMLWORLD for SMLWORLD, we may use the personal information contained in cookies to track the use of our websites.

How is my personal information stored?

SMLWORLD is delivered on a Software As A Service (SaaS) cloud-based software delivery model using Microsoft Azure hosting environment, and as such all personal information is stored within Microsoft Azure hosting services. We adhere to all the requirements regarding cloud services that are defined in ISO27017 (information security) and ISO27018 (personally identifiable information). In addition, Microsoft Azure is ISO27018-compliant.

For further technical details regarding our server and database security, please refer to our Server & Database Security Policy (SW-POL-003).

How long will my personal information be stored, and what happens afterwards?

Personal information will not be held or processed for a longer than necessary period for the purposes for which the personal information was collected, unless otherwise required by law.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

What are your rights?

Each jurisdiction grants individuals certain lawful rights in respect of their personal information. SMLWORLD adopts the following rights in all jurisdictions:

- **Right to lodge a complaint:** you have a right to lodge a complaint to us at any time if you object to the way in which we have used or managed your personal information. Where you are dissatisfied with our response, you also have the right to escalate your

complaint to the relevant regulator in your jurisdiction (Refer to the Regulatory Authority per Jurisdiction section).

- **Right of access:** all individuals have a right to access their personal information held by an organisation. There will not usually be a charge to you for us to respond to these requests. However, where the request is deemed by us to be excessive, you may be charged a fee for our providing you with a record of your Personal Information that is held by us. Your Personal Information will usually be provided to you in hard copy, unless otherwise requested. Where you have made the request to receive a record of your Personal Information held by us by electronic means, we will endeavour to provide the data in the requested format where we can.
- **Right of rectification:** we take reasonable steps to ensure that the personal information we collect and hold about you is accurate and complete. However, if you do not believe this is the case, you have the right to request we rectify the inaccuracy at any time.
- **Right to erasure:** you have the right to require us to delete your information if our continued use is not justified. However, this will need to be balanced against other factors; depending upon the type of personal information we hold about you and why we have collected it, there may be some legal and regulatory obligations which mean we cannot comply with your request.
- **Right to restrict processing:** in some circumstances, although you may not be entitled to require us to erase your information, you may be entitled to limit the purposes for which we can use your information.
- **Right of data portability:** you have the right to require us to provide you with a copy of the personal information that you and your Company have supplied to us in a commonly used machine-readable format, or to transfer your information directly to another controller (e.g., a third party offering services competing with ours). Once transferred, the other party will be responsible for looking after your personal information.
- **Right to withdraw consent:** for certain limited uses of your personal information, we may ask for your consent. Where we do this, you have the right to withdraw your consent to further use of your personal information. If you withdraw your consent, we may not be able to provide certain products and services to you. If this is the case, we'll tell you at the time you ask to withdraw your consent.

If you would like to exercise any of the above rights, please contact us using the details outlined in Who are SMLWRLD?

Regulatory Authority per Jurisdiction

Country	Authority Name	Website	Contact Details
United Kingdom	Information Commissioner's Office	www.ico.org.uk	Wycliffe House, Water Lane Wilmslow, Cheshire SK9 5AF T +0303 123 1113 (or +44 1625 545745 if calling from overseas) F 01625 524510
Ireland	An Coimisinéir Cosanta Sonraí (or the Data Protection Commission)	www.dataprotection.ie	Dublin: 21 Fitzwilliam Square, Dublin 2, D02 RD28, Ireland Regional Office: Canal House, Station Road, Portarlinton, R32 AP23 Co. Laois Telephone: +353 57 868 4800
Australia	Office of the Australian Information Commissioner (OAIC)	www.oaic.gov.au	GPO Box 5218, Sydney NSW 2001 T 1300 363 992 enquiries@oaic.gov.au
To find the national DPA for an EU Member State visit https://edpb.europa.eu/about-edpb/board/members_en			

Instructions imposed upon SMLWRLD Employees and Consultants

All SMLWRLD employees or consultants shall comply with the following instructions when processing personal information during their employment with or assignment for SMLWRLD:

- Consider the General Principles outlined above on how personal data may be processed, and keep them in mind when processing personal information.
- Keep in mind that "processing" of personal information is every operation or set of operations performed on personal information, those performed both automatically and manually, e.g., collecting, storing, reading, generating, changing and deleting personal information.
- Limit the collection and processing of personal information to what is needed for the specific purpose.
- Maintain information security for the personal information that you use or are responsible for, e.g., by using complex passwords and locking your computer when you leave it unattended.

- Erase all personal information that is stored on an individual's computer that is no longer necessary to process, considering the purpose for which it was collected.
- Only share personal information to colleagues that is authorised and that they need to have.

SMLWORLD is dedicated to ensuring all personal information provided is handled with care and integrity. We offer transparency across our product and our business, guaranteeing that areas of improvement are constantly identifiable.

SMLWORLD's Privacy Policy is fully supported by senior management.

Our policy will be monitored and reviewed annually to ensure that our Privacy Policy is strictly adhered to.



Daniel Jones (Managing Director)



Simon Tuke (Chief Operating Officer)