



# Hero PA Privacy Notice

This privacy notice is provided to inform about how and why your personal data is used so that we can be as transparent as possible, and to ensure that you are aware of your rights under data protection legislation.

## **The Company**

We are Hero PA, a trading style of Best Number Ltd, of 10 Kings Court, Horsham, RH13 5UR. Our company registration number is 10957186. We are registered with the ICO under registration ZB278381. We can be contacted on 01403 457247 or at support@hero-pa.co.uk.

## **The purpose for processing your data and our basis for doing so.**

We process personal data so we can engage with potential clients through our marketing and networking activities as well as and provide our services to our existing clients. We also process your personal data to maintain communication and to send information about ourselves and our services which we believe is relevant.

When we process your personal data, we must establish our legal basis for doing so and that legal basis can be different depending on circumstances in which we process it. You will see references to the basis of processing e.g., "(Article. 6.1.f)" and this is a reference to the article of the UK General Data Protection Regulation under which we undertake the processing in question.

We process the data you provide directly on email or telephone. For our clients, we process your full name, telephone number(s) and job title. We do this under the legal basis of Article 6.1.f of the UK GDPR 'legitimate interest' as we have a legitimate interest in maintaining our client relationship.

We use brought in B2B lists for the purpose of marketing. These lists have been checked for lawful basis and against the telephone preferencing service as well as the corporate telephone preference service. This data comprises full name and contact details. Our B2B direct marketing is undertaken as a legitimate interest activity under Article 6.1.f UK GDPR. As required by the UK GDPR, we will inform you we have your data as soon as possible, but within one month.

As a client, we will process your name, telephone number and email address, for the purpose of communication you for the duration of our commercial relationship.

Our MessageHub facility will collect your IP address and device details to support fault finding.

If you fail to provide the information required, we will be unable to provide the agreed services to you.



# Hero PA Privacy Notice

## **Communications**

Hero PA may conduct direct marketing activities and call to explain our services. We may also send you an email if we cannot contact you by telephone. As we operate a strictly B2B marketing regime, we conduct this as a legitimate interest activity. You can object to us using your personal data for marketing purposes by contacting us or using the unsubscribe option on an email.

## **Recipients of your data**

As a general principle, we will not share your personal data to other recipients without your permission. There are some exceptions to this:

- It is possible, that we might be obliged to disclose personal information in response to a court order or other lawful obligation. Our lawful basis for this is Article 6.1.c - legal obligation.
- If you do not pay your bills, we may choose to engage a third party to recover any money you owe us. Our lawful basis Article 6.1.f (legitimate interest) as we have a legitimate interest to recover any money owed to us.
- We use the services of an external accountant who may have limited access to your data. Our lawful basis for this is legitimate interest (Article 6.1.f UKGDPR) as we have a legitimate interest in the management of our accounts.

## **Data processed by third parties on our behalf.**

We use the services of other organisations in the processing your data. We use Google email and document storage, video conference platforms, telecommunication companies for our phone systems and analytics. We utilise outsourced IT support as well as external support for our call systems.

For business continuity purposes and at times of exceptional load, we utilise the services of an additional call centre company. This company provides dedicated staff to securely remote access our call system.

Those organisations that process personal data on our behalf are subject to a data processing contract as required by Article 28 of the UK GDPR. This ensures that your data is handled in accordance with the UK GDPR.

## **Transferring your data outside of the UK**

We do transfer data outside of the UK as some of our cloud platforms are located overseas in the USA. We ensure that there are approved mechanisms to do so, such as adequacy decisions under Article 45 UK GDPR, standard contractual clauses under Article 46.2 UK GDPR or in exceptional circumstances, allowable derogations under Article 49 UK GDPR. Transfers to the USA are covered by the use of Standard Contractual Clauses.



# Hero PA Privacy Notice

## Retention periods

We will retain your data only for the time we require it for the purposes stated and / or where we have a legal obligation or other legitimate purpose. We will retain client data for the duration of our contract and following termination, all data is erased. If you request a pause in the service provision, we will retain your data until such time you cancel or inform us otherwise.

## Security

The UK GDPR requires us to implement technical and organisational measures to protect your data. We have developed policies and procedures to ensure we treat personal data lawfully and keep it secure. We train our staff on the requirements of the legislation and the need for data protection. Our IT systems have protection installed and our online platforms are accessed through user authentication. We have role based access controls in place. Our systems are backed up to provide availability of data.

## Your rights

The UK GDPR provides you with several rights in relation to the data of your we process. The rights relevant to our activities are:

- You have the right to get access to and copies of your personal data.
- You can in certain circumstances, restrict our processing of your data and request us to erase it (although we may have to retain some for legal reasons).
- You can ask us to rectify any inaccurate information we may be holding.

If you want to exercise any of these rights, contact us on the above email address.

You also have the right to lodge a complaint about our processing with a supervisory authority — the UK's Information Commissioner's Office.

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Telephone: 0303 123 1113  
Website: [www.ico.org.uk](http://www.ico.org.uk)