



# Privacy Policy

Panoramic Data policy document

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# 1 Document Control

## 1.1 Revision History

This table contains the revision history for this document. Please add a line to this table if you revise the document.

Version	Date	Author(s)	Details
0.1	2020-04-02	Elizabeth Whyman	Draft for internal review
0.2	2020-04-02	David Bond	Reviewed
1.0	2020-04-02	David Bond	Released
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1.3	2022-05-12	Elizabeth Whyman	Reviewed
1.4	2022-06-12	David Bond	Released
1.5	2023-07-11	David Bond	Reviewed and re-issued

## 1.2 Company Information

This table contains all relevant information to the company.

Panoramic Data Limited	
Document Role	Provider of Services
Address	Panoramic House, 46 Heywood Avenue, Maidenhead, Berkshire SL65 3JA, United Kingdom.
Telephone No.	+44 (0)8432 899811
Registered in England & Wales	6982102

## 1.3 Authors & Authorities

This table shows document authors and authorities.

Author(s)	Company	Role	E-mail	Contact Number
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## 2 Introduction

Panoramic Data Limited (henceforth “PDL” or the “Company”) respects your privacy and is committed to protecting your personal data. This privacy policy explains:

- How, why and when we use your data
- Your privacy rights
- How the law protects you

Please read this policy carefully and contact us if you have any questions or concerns about the privacy practices of Panoramic Data Limited.

### 2.1 Who are we?

Panoramic Data Limited is the organization who deals with personal data (Data Processor) as instructed by the customer (Data Controller) for specific purposes and services offered to the controller that involve personal data processing.

Panoramic Data Limited is compliant with its obligations under the General Data Protection Regulation (EU) 2016/679 (GDPR) by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining data unnecessary for the claimed purpose; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate measures are in place to protect personal data.

### 2.2 Changes to the policy

If the Company wishes to use your personal data for a new purpose, not covered by this policy, then we will provide you with a copy of our new policy explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, the Company will seek prior consent to the new processing.

## 3 Collecting your data

### 3.1 What data is collected?

Personal data, or personal information, means any information about an individual from which that person can be identified. Identification can be by the information alone or in conjunction with any other information in the Data Processor's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (EU) 2016/679 (GDPR) which is a regulation in EU law on data protection and privacy in the European Union (EU) and the European Economic Area (EEA), and which also addresses the transfer of data outside the EU/EEA.

The Company may collect, use, store and transfer the following personal data:

Data Type	Examples
Identity	First name, Last name
Contact Details	Company billing address, user emails
Financial and Transactional	Bank account number, payment details
Usage	Last log on to systems operated by Panoramic Data
Preference	Communication and marketing preferences

### 3.2 When is data collected?

Data may be directly collected in the following ways:

- Via postal, telephone, email or website enquiry
- When subscribing to systems operated by Panoramic Data
- When you complete a feedback form in systems operated by Panoramic Data
- When you sign a contract or send a purchase order or other financial document
- When systems operated by Panoramic Data collect that information from your systems for example via API.

With your express consent and with credentials you have provided to us, we may also access data about you from:

- Payment and delivery providers
- Third party applications such as LogicMonitor or ServiceNow for example via API

Data may also be collected from:

- Publicly available sources such as Companies House

## 4 Using your data

Data is processed according to this privacy policy and the applicable law of the country where the data is located. All data always remains in the UK unless otherwise stated in writing and as agreed with you in advance.

Panoramic Data Limited treats your data confidentially and discloses or shares it only when necessary to provide its services to you and in the following circumstances:

- Where you consent to it
- Under the terms of a contract we have with you, for example, to send invoices to the correct address
- For our legitimate business interests if your rights do not override those interests – for example, to provide a quotation or update you on our services
- To conduct normal business operations, for example to make you aware of an issue
- Where we need to comply with a legal or regulatory obligation, for example to retain payment details for compliance with HMRC rules

## 5 Storing your data

### 5.1 Where is data stored?

Unless otherwise agreed (see above), all data stored by the Company is stored in one or more of the following locations:

- Our colocation facility in the UK
- Our UK-based Azure cloud facility

Please see our Security Policy for full details on this.

### 5.2 How is data secured?

The Company has appropriate security measures in place to prevent your personal data from being accidentally changed, deleted or lost, used or accessed by or disclosed to unauthorised parties. Please see our Security Policy for full details on this.

### 5.3 Who has access to your data?

Your personal data is accessible only to Panoramic Data Limited staff who have with a business need to know. They will process your data on our instructions and are subject to a duty of confidentiality. We have procedures in place to deal with any suspected misuse of data or breach and where we are legally required to do so, would notify you and any applicable regulator if a breach or misuse were to occur.

We do not share your data with third parties unless legally obliged to do so.

### 5.4 For how long is your data kept?

In accordance with GDPR, we retain data for no longer than reasonably necessary to fulfil the purposes for which we collected it, including satisfying any legal, accounting, or reporting requirements.

This is expected to be for the period a customer has a valid contract with Panoramic Data Limited and (where necessary in order to comply with UK tax law and the statute of limitations) for a further six years afterwards.

If you cease to be a system subscriber, we will immediately delete your user account details and connections to third party systems that also provide access to the protected data, as well as any credentials that you have given us, unless we are obliged to retain it in accordance with local laws or contractual obligations.

Where your data is also stored in backups, the backup files are retained for no longer than necessary and within the 6-year requirement above.

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## 6 Analysis and tracking data

### 6.1 Email address

When you log on to systems operated by Panoramic Data Limited, you provide your email address as part of system authentication. This is retained to enable system authentication and notifications.

### 6.2 Do we use cookies?

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) and that enable the site's or service provider's systems to recognise your browser and capture and remember certain information.

Cookies are used to help us understand your preferences based on previous or current site activity, enabling us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences in the future. We use cookies to:

- Understand and save user's preferences for future visits
- Provide system security

If you disable cookies, some systems and or system features may not function.

#### 6.2.1 Google cookies

We use third-party cookies (such as the Google Analytics cookies) or other third-party identifiers to compile data regarding user interactions. This information is never shared with third parties.

### 6.3 How does our site handle 'do not track' signals?

We honour do not track signals and do not track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.

## 7 Your data protection rights

In accordance with GDPR, we respect the right of Data Controllers to access and control their personal data. Specifically, you have the following rights with respect to your data:

- The right to request a copy of the data which Panoramic Data Limited holds about you
- The right to request that Panoramic Data Limited corrects any personal data if it is found to be inaccurate or out of date
- The right to request your personal data is deleted where it is no longer necessary for Panoramic Data Limited to retain such data
- The right to withdraw your consent to the processing of your personal data at any time
- Where applicable, the right to request that the Data Controller provide the Data Controller with their personal data and where possible, to transmit that data directly to another Data Controller (known as the right to data portability)
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing
- Where applicable, the right to object to the processing of personal data
- The right to lodge a complaint with the Information Commissioners Office

Data Controller rights may be limited, if fulfilling your request may expose personal data about another company or individual, or if with regard to deleting data which we are required by law to keep.

### 7.1 How to contact us

If you have questions or concerns about our privacy practices, your personal information, or if wish to file a complaint, contact details in the first instance are as follows:

- David Bond
- Panoramic House, 46 Heywood Avenue, Maidenhead, Berkshire SL6 3JA
- Tel: +44 (0)8432 899 811
- Email: [david.bond@panoramicdata.com](mailto:david.bond@panoramicdata.com)
- Website: [www.panoramicdata.com/contact/](http://www.panoramicdata.com/contact/)

### 7.2 How to contact the appropriate authorities

You have the right at any time to make a complaint to the UK supervisory authority for data protection issues, the Information Commissioners Office (ICO).

- Tel: 0303 123 1113
- Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
- Email: [icocasework@ico.org.uk](mailto:icocasework@ico.org.uk)
- Website: <https://ico.org.uk/global/contact-us/email/>



Signed for and on behalf of Panoramic Data Limited

Signature



Name David Bond

Title Director

Date