**PRIVACY STATEMENT**

**In this Privacy Policy references to 'we' and 'us' are to Just Delegate Limited.**

**What information we collect and how:**

**The information we collect via this website may include:**

**(1) Any personal details you type in and submit, such as name, address, email address, etc.**

**(2) Your IP address (this is your computer's individual identification number) which is automatically logged by our web server. This is used to note your interest in our website.**

**(4) Your preferences and use of email updates, recorded by emails we send you (if you select to receive email updates on products and offers).**

**(5) Session information stored in cookies, these do not include any personal information and are used to ensure the correct data is extracted from the database when using any interactive systems we have.**

**(6) Under no circumstances we hold sensitive payment details such as payment card number, expiry date and security code. All transactions are handled via direct bank transfer or PayPal.**

**What we do with your information:**

**Any personal information we collect from this website will be used in accordance with the Data Protection Act 1998 and other applicable laws. The details we collect will be used:**

**(1) To process our service to you, for accounting services and to provide after-sales service. We never pass your details on to any third party organisation, whether this is for marketing purposes or undertaking any other service we provide.**

**(2) To comply with legal requirements.**

**(3) In certain cases we may use your email address to send you information on our service. In such a case you will always have the option to opt in or out.**

**We do not use third parties to carry out any activities on our behalf.**

**The legal basis for processing your information:**

**Under GDPR, the grounds upon which we process the information collected is:**

**Necessary for entering into or performing a contract, in order to perform the obligations that we undertake in providing a service to you and steps at your request to enter into a contract with us.**

**Digital audio files/transcripts:**

**We do not store any digital audio files for longer than is necessary to complete the transcript(s) for which they are sent to us. All digital audio files are securely deleted from our systems immediately.**

**Transcripts are completed and returned to clients, and securely electronically deleted from our systems as soon as acknowledgement of receipt has been received from clients.**

**Transcripts can be emailed and encrypted or can be returned to clients through high security encrypted web transfer.**

**Currently we are using Hightail/Opentext as our preferred internet file transfer system. Hightail/Opentext is a global leader in Enterprise Information Management, with office bases and servers around the world including the UK.**

**Audio files that are transferred to us via Hightail/Opentext are deleted from the Hightail/Opentext system as soon as they are downloaded into our workflow system.**

**Security:**

**Hightail/Opentext, all data in transit is encrypted using strong SSL/TLS encryption up to 256-bit and supporting forward secrecy. File names are dynamically scrambled. All data in Hightail's secure data centers is encrypted using AES 256-bit encryption.**

**Just Delegate’s workflow system:**

**Audio files and transcript(s) are securely deleted from our system as soon as transcript(s) are returned to clients.**

**We run a strict ‘No Retention’ policy.**

**Our internal software systems, and internet security programmes are secure, we operate under a robust two factor authentication password system.**

**Your rights:**

**(1) You can ask us to update or remove your personal information by emailing us or by writing to us at the address below. However, please note that we may need to keep some personal data in order to process orders/transactions or to comply with customer service or after sale obligations.**

**(2) You also have the right to request any personal information we hold about you.**

**Just Delegate Ltd**

**29 Chilton Way**

**Dover**

**Kent**

**CT17 0QA**

**This privacy policy only covers Just Delegate and their website,** [www.just-delegate.co.uk](http://www.just-delegate.co.uk)