



# Pacific Privacy Statement – External Parties:

*November 2022*

We are committed to safeguarding the privacy of the personal data we may collect in the course of our business, and to meeting our requirements under the Data Protection Act 2018. Please read the following privacy policy to understand how we collect and use your personal data - for example, when you contact us, sign up to our mailing list, visit our website, transact with us, or apply for positions with us. Personal data may include names, addresses, contact details, career and educational history, and commercial history with Pacific. This privacy policy also explains the rights available to you in respect of your personal data.

## **Ways we collect and use personal data:**

### **Job applications:**

If you are making a job application or inquiry, you may provide us with a copy of your CV or other relevant information. We may use this information for the purpose of assessing your application or inquiry. We may also keep this information on file to contact you about future opportunities, unless you ask us not to do this.

### **Account management:**

If you obtain products or services from us, or supply us with products or services, we may use your contact details and (where applicable) payment information for the purposes of (i) providing training, customer support, and account management, (ii) order processing and billing, (iii) verifying your usage of the products and services in accordance with the terms and conditions of your agreement with us, (iv) carrying out checks for export control, anti-bribery, anti-corruption, the prevention of modern slavery, and other compliance purposes in accordance with requirements under applicable law; (v) contacting you (including by email communication) regarding service expiry, renewal, and other related notices, and (vi) maintaining our company accounts and records.

### **Marketing, Promotions, and Social Media:**

We may contact you from time to time in order to provide you with information about products and services that may be of interest to you. Such communications may contain tracking technology that tells us whether you opened the communication and whether you followed the hyperlinks within the communication, in order to help us analyse the effectiveness of, monitor, and improve our marketing campaigns. All marketing communications that we send to you will respect any marketing preferences you have expressed to us and any consent obligations required under applicable privacy, anti-spam rules, and social media platform privacy settings. We do not collect or store social media data

A handwritten signature in black ink, appearing to read "John Doe", located in the bottom right corner of the page.

separately to the social media platform. You have the right to ask us not to process your personal data for certain or all marketing purposes.

### **Website:**

Our website uses "cookies" to identify users as you use the site. These are used to analyse how our website is used and compile anonymous and aggregate statistics, and not to identify individual users.

## **Your data protection rights:**

You have the following data protection rights:

- You can **access, delete or request portability** of your personal data by requesting this of our Information Security Officer at [data@pacific.co.uk](mailto:data@pacific.co.uk). If you do so, we will acknowledge your request, confirm your own identity, locate your data, and agree with you an appropriate method to transfer the data. This will be within one month.
- You can ask us to **correct or update** your personal data, **object to processing** of your personal data, or ask us to **restrict processing** of your personal data by requesting this of our Information Security Officer at [data@pacific.co.uk](mailto:data@pacific.co.uk).
- You have the right to **opt-out of marketing communications** we send you at any time. You can usually exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you. Alternatively, or to opt-out of other forms of marketing (such as postal marketing or telemarketing), then request this of our Information Security Officer at [data@pacific.co.uk](mailto:data@pacific.co.uk).
- If we have collected and process your personal data with your consent, then you can **withdraw your consent** at any time by requesting this of our Information Security Officer at [data@pacific.co.uk](mailto:data@pacific.co.uk). Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain** to a data protection authority about our collection and use of your personal data. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

## **Legal basis for processing personal data:**

Our legal basis for collecting and using personal data will depend on the personal data concerned and the specific context in which we collect it.



However, we will normally collect personal data from you only where we need the personal data to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms, or where we have your consent to do so. In some cases, we may also have a legal obligation to collect personal data from you or may otherwise need the personal data to protect your vital interests or those of another person.

If we collect and use your personal data in reliance on our legitimate interests (or those of any third party) other than as described in this privacy policy, we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal data, please request this of our Information Security Officer at [data@pacific.co.uk](mailto:data@pacific.co.uk).

### **With whom might we share your personal data:**

We may transfer or disclose your personal data to the following categories of recipients:

- To our group companies;
- To our distributors, and other channel partners in order to process your order or sales enquiry, manage your subscription, provide technical or customer support, advise of upcoming product or service subscription expiry and renewal dates, or as otherwise notified to you when we collect your personal data;
- To any government department, agency, court or other official bodies where we believe disclosure is necessary (i) as a matter of applicable law or regulation (such as in response to a warrant, court order, or other legal process), (ii) to exercise, establish, participate in, or defend our legal rights, or limit the damages we sustain in litigation or other legal dispute, or (iii) to protect your vital interests, privacy, or safety, or those of our customers or any other person;
- To a potential or actual buyer or transferee (and its agents and advisers) in connection with any proposed or actual transfer of control, purchase, merger, reorganisation, consolidation, or acquisition of any part of our business, provided that we inform the buyer or transferee it must use your personal data only for the purposes disclosed in this privacy policy;
- To any other person with your consent to the disclosure.

Except as set out above, we will not disclose your personal data save where we need to do so in order to enforce this privacy policy, our rights generally, or where required or permitted by applicable local or foreign law.

### **Data retention:**

We retain personal data we collect from you for as long as necessary for the purposes for which the personal data was collected or where we have an ongoing legitimate business need to do so (for example, to provide you with a product or service you have requested, to ensure that transactions can be processed, settled, refunded, charged back, or to identify fraud), or to comply with applicable legal, tax, or regulatory requirements.

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

### **Data security:**

We have implemented appropriate technical and organisational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law.

Where we make use of "cloud" storage systems to hold personal data, these are stored within EU data centres, encrypted but in transit and at rest, and within data centres that work in accordance with the Data Protection Act 2018.

Because the internet is an open system, the transmission of information *via* the internet is not completely secure. Although we will implement all reasonable measures to protect your Personal Data, we cannot guarantee the security of your data transmitted to us using the internet - any such transmission is at your own risk and you are responsible for ensuring that any Personal Data that you send to us are sent securely.

### **Data minimisation and accuracy:**

We take every reasonable step to ensure that any personal data we hold is both accurate, and is limited to the personal data reasonably necessary in connection with the uses outlined above.

It is the Information Security Officer's responsibility to regularly monitor both, and ensure that any issues reported with either are rectified without undue delay.