

PRIVACY NOTICE

This privacy notice explains what to expect when Shaping Cloud LTD collects personal information in the course of its business operations.

Who are “We?”

Digital Transformation and Cloud is what we know and it's who we are. Formed in 2010, Shaping Cloud have seen the ever growing benefits of technology. Our mission is to help clients get clarity on their Digital Transformation and/or what cloud means for them and their organisation; differentiating between cloud that is just an illusion and that which brings true transformational value. Our company was formed from a genuine belief and passion for the opportunity that cloud offers. We work with our clients and partners in turning cloud to their advantage. Our products and services have been designed to swiftly inform, confidently plan, and deliver tangible and lasting difference, whilst ensuring that you are in control throughout. Whilst we maintain certifications and active partnerships in the main cloud provider platforms, we remain agnostic as a consultancy – ensuring our advice best meets your unique needs.

In this policy whenever you see “We”, “Us” or “Our” it refers to Shaping Cloud LTD (Shaping Cloud) : company number 07321331.

Registered office address: Regency House, 45-53 Chorley New Road, Bolton, Lancashire, United Kingdom, BL1 4QR

ICO Registration number: ZA710425

What is personal data?

Personal data is information that can be used to identify an individual, such as their name, address, phone number, email address or IP address. More information about what kind of information is classified as personal data can be found here.

Lawful basis for processing personal data

Under the EU General Data Protection Regulation (GDPR) there are six lawful basis for processing personal data. These are detailed as follows:

1. Consent – The individual has given clear consent for you to process their personal data for a specific purpose
2. Contract – The processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract
3. Legal Obligation – The processing is necessary for you to comply with the law (not including contractual obligations)
4. Vital Interests – The processing is necessary to protect someone's life
5. Public Task – The processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law
6. Legitimate Interests – The processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)

Further information regarding the lawful basis for processing personal data can be found at <https://ico.org.uk/>

Marketing and Sales Data

Shaping Cloud collects, processes and stores data relating to businesses and decision makers. We believe that the individuals that we process the data of, are likely to have an interest in the Shaping Cloud product. Deemed as 'Legitimate Interest' this is based upon specific criteria including the business industry sector, size of organisation as well as the individual's job function within the organisation.

We will only ever collect, process, and store the essential information required for contacting the data subjects within a business environment. The personal data we collect is limited to:

- First name
- Last name
- Email address
- Social profiles (limited to LinkedIn)
- as well as business IP address.
- Other business-related data may also be processed including business name, job function, turnover and business address, however we will never collect further personal data such as those classed under '[Special category data](#)'.

The data collected will be used to communicate marketing and sales messages relating to the Shaping Cloud products, based upon the job function held by the data subject. Shaping Cloud specifically only sends messages to those we believe are likely to be interested in the services we provide. Messages from Shaping Cloud could be delivered via email, social media, via telephone or any other business to business (B2B) marketing methods that may be relevant.

When you send Shaping Cloud an enquiry via our website you will be asked to provide your contact details. We will use the data you provide to process your request and may use it to inform you by email, telephone or mail about other Shaping Cloud products and services that we feel may be of interest to you, it is deemed that as you have visited the Shaping Cloud website and provided us with your contact information that you are legitimately interested in our products and services. You have the right to object from any method of correspondence at any time, using the unsubscribe button on an email, by informing the telephone operator or by contacting us via any of the methods below.

How we Procure Data

At Shaping Cloud we procure data in a variety of ways, collected in line with the lawful basis of 'Legitimate Interests'. If you have received correspondence from us, we will have procured your data in one of the following ways:

- You have requested information from Shaping Cloud on a previous occasion
- You or someone has sent us your email address requesting information about our articles and/or services be sent to you
- You or someone else has expressly shared your contact details with us for the purpose of receiving information now and/or in the future
- You or a business colleague has visited our website and we believe that there is a genuine legitimate interest in our services
- You have previously connected with a member of our team via LinkedIn and discussed our services
- A member of our team has found your business and your contact details online, believing that your business would genuinely be interested in the Shaping Cloud product, based upon

your job function aligning with our typical customer profiles they have made contact to introduce you to our product

- Your data has been purchased by a registered third-party data supplier, which will have been segmented by industry, organisation size and job function based upon our typical customer profiles. (Due diligence checks around GDPR compliance will have been conducted accordingly)

As per the ICO guidance we can confirm:

- We have checked that legitimate interests is the most appropriate basis
- We understand our responsibility to protect the individual's interests
- We have checked that the processing is necessary and there is no less intrusive way to achieve the same result
- We only use individuals' data in ways they would reasonably expect
- We are not using people's data in ways they would find intrusive or which could cause them harm
- We have considered safeguards to reduce the impact where possible
- We will always ensure there is an opt-out/ability to object
- We include information about our legitimate interests in our privacy policy

Your Rights as a Data Subject

1. Subject Access Request

If you wish to make a Subject Access Request or enact any of your below listed rights, you can do so by emailing: privacy@shapingcloud.com

2. Right of access to data held

Under Article 15 of the GDPR, you have a right of access to the personal data we hold on you. If you believe that we are processing your personal data, you can make a Subject Access Request to request the following:

- The purposes of our processing
- The categories of personal data concerned
- The categories of recipient to whom the personal data have been or will be disclosed.
- The envisaged period for which the personal data will be stored.
- The existence of the right to request from the controller rectification or erasure of your personal data, or the restriction of processing of your personal data, or the objection to processing of your personal data.
- The right to lodge a complaint with a supervisory authority.
- Where the personal data was not collected directly from you, any available information as to the source of the data.
- The existence of automated decision-making, including profiling, and any meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you.
- Information on the appropriate safeguards that have been put in place in the instance that your personal data has been transferred to an international organisation or third country.
- A copy of the personal data that we process (as long as doing so does not adversely affect the rights and freedoms of others)

3. Right to rectification

Under Article 16 of the GDPR, Shaping Cloud has the obligation to rectify, without undue delay, any inaccurate personal data. If you believe that the personal data we hold on you is inaccurate or incomplete, you can make a Subject Access Request to inform us of this inaccuracy and provide us with the necessary data to correct/complete our data files.

4. Right to erasure ('right to be forgotten')

Under Article 17 of the GDPR, you have the 'right to be forgotten'. In the event that you make a request for erasure, your record will be deleted in its entirety.

5. Right to restriction of processing

Under Article 18 of the GDPR you have the right to request that Shaping Cloud does not further process your personal data beyond storing it. This can be a useful alternative to requesting erasure. For example, you can make this request to ensure that your entire data record is kept in our suppression files but will not be processed for sales or marketing purposes.

6. Right to object

Under Article 21 of GDPR you have the right to object to the processing of your personal data for direct marketing purposes.

In all correspondence with you we will give you the right to object from receiving further correspondence from Shaping Cloud. On any emails you receive from Shaping Cloud there will be the option to 'unsubscribe' from receiving any further email correspondence. If you are contacted via LinkedIn, you can reply to the message to request no further correspondence. If you receive a telephone call from us, you have the right to verbally request not to receive any further calls. Shaping Cloud has a companywide CRM system, and your request to object will be logged to ensure that you do not receive any further calls or emails. If you wish to make an objection outside of the abovementioned methods, please make a Subject Access Request.

7. Your right to lodge a complaint to a supervisory authority

Under Article 77 of the GDPR you have the right to lodge a complaint with a supervisory authority if you believe the processing of your personal data infringes your rights. The relevant supervisory authority is the Information Commissioner's Office (ICO).

If you wish to lodge a complaint with the ICO you can do so here: <https://ico.org.uk/make-a-complaint/> or by calling their helpline on: 0303 123 1113

Links to other websites

This privacy notice does not cover the links within this site to other websites. We encourage you to read the privacy statements on the other websites you visit.

Current and former employees

Current employees should refer to their Employee Handbook or contact Shaping Cloud's Director of Operations.

Job applicants

Shaping Cloud is the data controller for the information you provide, unless otherwise stated.

The information you provide will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements relating to your employment. We will only share information with third parties where this is required to fulfil our legal or regulatory requirements. The information you provide will be held securely by us and our data processors whether the information is in electronic or physical format. We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

If your application is successful, please refer to the current and former employees' section. If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 6 months from the closure of the campaign.