

Why we use your personal information

We process your personal data for the following purposes:

- to provide you with the service activated and registered for
- the verification of your identity where required
- for the prevention and detection of crime, fraud and anti-money laundering
- for the ongoing administration of the service
- to allow us to improve the products and services we offer to our clients
- for research and statistical analysis including payment and usage patterns
 - We only use the data in an anonymised manner when we use your data for this purpose.
- to enable us to comply with our legal and regulatory obligations
- to offer new products and services to you which are relevant and appropriate, and only to the extent that would be reasonably expected.

If we plan to introduce further processes for the use of your information, we will provide information about that purpose prior to such processing.

The legal basis for processing

Under Data Protection Law, there are various grounds which are considered to be a 'legal basis for processing'.

The legal basis for processing should be determined by the Data Controller.

Where we are the Data Processor, the legal basis is determined by the Customer. Typically, the legal basis in this scenario is:

'processing is necessary for the performance of a task carried out in the public interest'

Where we are the Data Controller, the legal basis for processing is based on:

'processing is necessary for the purposes of legitimate interests pursued by the controller'

It should be noted that in some circumstances this legal basis may vary, however, we always operate in full compliance with Data Protection Law and will only process data with a fair and reasonable legal basis for doing so.

What personal information we process

In order to carry out these services, we obtain from the Client and process the following information:

Data Subject (Who)	Data Category (What)	Description
Client	Forename	This is the forename of the Client
Client	Surname	This is the surname of the Client
Client	Known as	This is the name that the Client is known as.
Client	DOB	if applicable
Client	Gender	This is the Client's gender
Client	Postal Address	The Client's postal address
Client	Authentication data	Username and password when applicable
Client Business Information	House Name	The text entered as the Client's house name.
Client Business Information	Street	The text entered as the Client's street.
Client Business Information	Town	The text entered as the Client's town.
Client Business Information	Postcode	The text entered as the Client's post code.
Client Business Information	Day Telephone	The Client's daytime telephone number.
Client Business Information	Home Telephone	The Client's home telephone number.

Client Business Information	Mobile Telephone	This is the Client's mobile telephone number
Client Business Information	Email	This is the Client's E-mail address
Client Business Information	Payment History and balances	This is the Client's history of payment transactions
Client Information	Payment card details	Payment card details Passed to our 3 rd party secure processor to Process
Client Business Information	In-app messages	Messages sent from application
Client	Trouble ticket data	When users submit trouble ticket information
Customer Business Information	Browser Details	IP address, cookies, browser information
Aim High Online Staff	Title	This is the staff member's title (Mr, Mrs, Ms, etc.).
Aim High Online Staff	Forename	This is the staff member's forename.
Aim High Online Staff	Surname	This is the staff member's surname.
Aim High Online Staff	Gender	The staff member's gender
Client	IP Address	The network address of your device or internet
Client	Browser Type and Version	The type of Web Browser your device is using
Client	Cookies	Special records in your browser

How we process your personal information

We use your personal information, and some of our employees have access to such information, only to the extent required to carry out the services for you the client.

We have introduced appropriate technical and organisational measures to protect the confidentiality, integrity and availability of your personal information during storage, processing and transit.

We operate an internet security programme to help protect your data at all times.

Some of our supporting services (for example Worldpay, Google, Twitter, facebook etc), might use cloud platforms that operate from Third Countries outside of the EEA. Where this is the case, we ensure that adequate safeguards are established to protect your data.

Your rights under Data Protection Law

Right to Access

You have the right of access to your personal information that we process and details about that processing.

However, should this not be possible, you can raise a Data Subject Access Request (DSAR) to receive this information in another format.

Right to Rectification

You have the right to request that information is corrected if it's inaccurate. However, should this not be possible, you can contact us to make the changes on your behalf.

Right to Erasure (Right to be Forgotten)

You have the right to request that your information is removed; depending on the circumstances, we may or may not be obliged to action this request.

Right to Object

You have the right to object to the processing of your information; depending on the circumstances, we may or may not be obliged to action this request.

Right to Restriction of Processing

You have the right to request that we restrict the extent of our processing activities; depending on the circumstances, we may or may not be obliged to action this request.

Right to Data Portability

You have the right to receive the personal data which you have provided to us in a structured, commonly used and machine readable format suitable for transferring to another controller.

Right to lodge a complaint with a supervisory authority

If you think we have infringed your privacy rights, you can lodge a complaint with the relevant supervisory authority. You can lodge your complaint in particular in the country where you live, your place of work or place where you believe we infringed your right(s).

You can exercise your rights by sending an e-mail to info@aimhigh.online. Please state clearly in the subject that your request concerns a privacy matter, and provide a clear description of your requirements.

Note: We may need to request additional information to verify your identity before we action your request.

Sharing personal information with third parties

We use a range of trusted service providers to help deliver our services. All of our suppliers are subject to appropriate safeguards, operating in accordance with our specific instructions and limitations, and in full compliance with Data Protection Law.

These service providers include:

- Payment Processors – to securely process your card payments (we do not see, or store payment card details)
- SMS Providers – to send out our SMS notifications or messages sent by Customers using PPL Products and Services
- Email Providers – to send out our email notifications or messages sent by Customers using PPL Products and Services
- Hosting Providers – to manage our secure enterprise datacentres
- Security Providers – to protect our systems from attack
- Telephony Providers – we might record calls for training, quality and security purposes

We may also have access to your personal information as part of delivering the service. If we need to change or add additional third parties, we will always update

our Privacy Notice accordingly. We will only disclose your information to other parties in the following limited circumstances

- where we are legally obliged to do so, e.g. to law enforcement and regulatory authorities
- where there is a duty to disclose in the public interest
- where disclosure is necessary to protect our interest e.g. to prevent or detect crime and fraud
- where you give us permission to do so e.g. by providing consent via an online application or consent form

How long we may keep your personal information

We will only retain information for as long as is necessary to deliver the service safely and securely. We may need to retain some records to maintain compliance with other applicable legislation – for example finance, taxation, fraud and money laundering law requires certain records to be retained for an extended duration, in some cases for up to seven years.

Changes to our Privacy Notice

This policy will be reviewed regularly and updated versions will be posted on our websites.

Contact details for our Data Protection Officer

We have appointed a Data Protection Officer (DPO); their contact details are as follows:

info@aimhigh.online

or

Data Protection Officer
Aim High Online Ltd
52 Falsgrave Road
Scarborough
North Yorkshire
YO12 5AX