



## No Letting Go Privacy Policy

### Definitions:

Clients:	means all customers of No Letting Go who provide personal data to enable NLG to fulfil the terms of our contract with the customer.
Data Protection Laws:	means (i) to the extent the EU GDPR applies, the law of the European Union or any member state of the European Union to which the Client is subject, which relates to the protection of personal data; or (ii) to the extent the UK GDPR applies, the law of the United Kingdom or of a part of the United Kingdom which relates to the protection of personal data.
DPO:	means Data Protection Officer.
Franchisees:	means all existing NLG franchisees.
EU GDPR:	means the General Data Protection Regulation ((EU) 2016/679).
Infusionsoft:	means Infusionsoft or any other Client Relationship Management software and its third-party servers. This is the storage and management data base system where all No Letting Go marketing is managed and stored.
Kaptur:	means Kaptur Management Suite or the mobile devices used to collect information from on site.
KMS:	means Kaptur Management Suite and its third-party servers. This is the storage and management data base system where all No Letting Go and Kaptur reports are generated, managed and stored.
NLG:	means No Letting Go, No Letting Go offices, Kaptur software or any third-party company used by the group for processing information or hosting.
No Letting Go:	means No Letting Go Inventory Management Ltd.
Prospects:	means all potential people with whom NLG are marketing to and/or discussing joining the NLG franchise network or all potential users of the NLG services.
Service:	means any service that NLG or its offices provide, including the sale of NLG franchises and and Kaptur software licences.
UK GDPR:	is defined in section 3(10) (as supplemented by section 205(4)) of the Data Protection Act 2018.

### Policy Statement

No Letting Go have taken steps to ensure that all personal data we collect falls in line with Data Protection Laws.

No Letting Go collects personal information when you register with us or place an order for products or services. Personal information that you supply to us may be used in several ways:

- To allow us to fulfil the terms of our contract with you
- To provide information related to a franchise enquiry
- For statistical analysis
- For feedback on service levels provided

We will use this information to provide the services requested, maintain records and, if you agree, to send marketing information.

We will not disclose any information to a person or organization outside the No Letting Go group for any other reason unless required to do so by law.

### Policy Details and Procedures

NLG, our clients and our franchisees are all controllers of personal data.

Personal data from our clients is received by NLG, either directly into our management system (KMS) by the client or via other electronic or physical forms (works order, e mail, telephone etc.) and is inputted into KMS. This information is used solely by NLG to carry out the service we provide, including support and feedback. This is classified as “information necessary to fulfil the terms of a contract”.

Personal data from our prospects is received by NLG via web site, direct enquiries and through external franchise shows by physical and electronic forms. This information is stored securely in Infusionsoft used solely by NLG to follow up on enquiries until instructed otherwise.

No Letting Go policy is to delete all unrequired electronic or physical personal data.

Detailed information on how we manage, and store data is listed below in policy details and procedures.

#### 1. Data and application storage.

All data is stored in the UK, through our third-party host company on dedicated servers hosted by Rackspace. Some data is temporarily stored and transferred through AWS (Amazon web servers), who are fully compliant with Data Protection Laws.

Personal data collected with permission from the personal holder for the purposes of providing information to prospects is stored securely in Infusionsoft. All communication from this system has an opt out option.

All physical data is locked away until the terms of the contract are fulfilled and destroyed thereafter.

#### 2. Data transfer policy

We do not transfer Client personal data between data centres outside of the EU or EEA.

#### 3. Data Protection Officer



No Letting Go have a nominated data protection officer and policies and procedures in place to ensure access to Client's data is protected. For further information, please contact [gdpr@nolettinggo.co.uk](mailto:gdpr@nolettinggo.co.uk)

#### **4. Data controls and risk management processes.**

No Letting Go has a comprehensive secure development and data protection policy in place as well as a number of physical, procedural and software-based methods to protect any data hosted by our software processing partners. This includes:

- Dedicated firewalls which block all except essential ports from accessing our servers.
- A process of regular automated scanning for security vulnerabilities by an accredited Automated Scanning Vendor (ASV)
- Ensuring that all access to our systems is performed over SSL (Secure Socket Layer) using perfect forward secrecy where supported by the Client web browser. Our SSL configuration is tested regularly using a third-party SSL strength tester.
- All remote access from our offices is performed over encrypted links.
- Our local network is configured with strong passwords and automatic lockouts
- All servers are configured with intrusion detection systems which track a number of suspicious events such as: remote logon outside normal hours, software installation, service modifications, etc.

#### **5. New Version Release Process**

All changes to our KMS software are released to a test system prior to release on the live environment to provide sufficient time to ensure that the changes function as requested and that changes to functionality have not exposed data that should not be visible.

#### **6. Access to data**

All technical and operational staff from No Letting Go have full access to the KMS database so as to be able to resolve issues as requested. All clients have password protected logons to the Kaptur Management System with access to their information only. Only the NLG marketing team have access to Infusionsoft. All users have password protected logons to Infusionsoft with access to their information only.

#### **7. Auditing security and technical measures on the protection of data.**

We are happy to provide our clients with access to our data protection policy and if necessary, arrange for an audit at No Letting Go head office at the Client's own cost.

#### **8. Security breach notification process.**

All production servers and our development offices are set up with a custom intrusion detection system that monitors a number of key events. These include:

- Modification of firewall rules
- VPN access to the office
- Login to the production systems outside work hours
- Installation of software
- Updates to Windows Services
- Addition and modification of users and user groups

Upon detection of any of these events, No Letting Go's support team is immediately notified by email and will investigate. Windows event logs are expanded in size on all production systems to allow No Letting Go to further investigate any potential breach and once the impact is known, Clients would be notified immediately.

No Letting Go staff or regional office staff are also required to notify the operations manager, DPO or technical director immediately if they think that any passwords or physical access tokens they use to access either production systems or our internal network have been compromised. This includes keys to the office, key cards for the office, network passwords and production server passwords.

#### **9. NLG Password and Training Policy**

It is NLG policy to change passwords on a regular basis and provide training as required on policy changes.

#### **10. Binding Corporate Rules**

No Letting Go do not perform intra-organisational transfers of personal data across borders and as such do not follow Binding Corporate Rules.