



1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

2. Responsibilities

- 2.1 The GDPR Owner is responsible for ensuring that this notice is made available to data subjects prior to Spectrum Center collecting/processing their personal data.
- 2.2 All Employees/Staff of Spectrum Center who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Privacy notice

3.1 Who are we?

Spectrum Center exists to support radio spectrum users. They are experts in planning, modelling, measuring and regulation. The ability to find solutions to customers' problems is the reason why Spectrum Center is nearly three decades in operation.

The Spectrum Center GDPR Owner and data protection representative can be contacted directly:

- info@spectrum.center
- 01293 522052

The personal data we would like to collect from/process on you is:

Personal data type:	Source (where Spectrum Center obtained the personal data from if it has not been collected directly from you, the data subject. Note if the personal data has been accessed from publicly accessible sources):
Name	
Address	
Email address	



Spectrum Center Ltd
Registration No. 3198786
Registered Office: Pavilion View, 19 New Road, East Sussex, BN1 1EY





Telephone details	
Video recording	
Location data	
Website cookies	
Account information	

The personal data we collect will be used for the following purposes:

- Marketing
- Customer support
- HR
- Finance (HMRC)
- Webinars
- Product fulfillment
- Training Courses

Our legal basis for processing for the personal data:

- Contractual
- Consent
- Legal Obligation
- Vital interests
- Legitimate interests

Any legitimate interests pursued by us, or third parties we use, are as follows:

- For existing business to business customers, we will market our services to you based on commercial legitimate interest. You will always have the option to object to your data being processed in this way.

Special categories of personal data are not collected, stored or processed by Spectrum Center.

3.2 **Consent**

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified. Consent is required for Spectrum Center to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data, we will always tell you why and how the information will be used.

You may withdraw consent at any time by opting out of marketing through the unsubscribe link in emails or by contacting any member of Spectrum Center.



3.3 Disclosure

Spectrum Center will not pass on your personal data to third parties unless explicit consent has been given or the data is to be processed under the contractual agreement that's been made with the data subject.

3.4 Retention period

Spectrum Center will process personal data only for as long as it is required and necessary for the purpose it was originally collected. At the end of the retention period, personal data will be deleted or anonymized. If data is anonymized, no personally indefinable information will be retained, leaving only statistical data which may be used for analysis or business planning.

Some examples of our retention periods are:

Customer account information:

This will be retained for as long as the account is active. When an account becomes inactive, the retention period starts, and your data will be kept for six years before being deleted or anonymized.

Financial information:

This will be retained for seven years in line with current regulations.

3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.



- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: if Spectrum Center refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Spectrum Center or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Spectrum Center's GDPR Owner.

The details for each of these contacts are:

	Supervisory authority contact details	GDPR Owner contact details
Contact Name:	Information Commissioner's Office	GDPR Owner
Address line 1:	Wycliffe House	The Beehive
Address line 2:	Water Lane	City Place
Address line 3:	Wilmslow	Gatwick Airport
Address line 4:	Cheshire	West Sussex
Address line 5:	SK9 5AF	RH6 0PA
Email:	NA	info@spectrum.center
Telephone:	0303 123 1113	01293 522052

3.7 Privacy statement

Read more about how and why we use your data here:

<https://public.spectrum.center/public/privacy>



4. Online privacy statement

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

How we use your information

This privacy notice tells you how Spectrum Center will collect and use your personal data.

- We will collect and process your personal information to facilitate any orders we receive for our products.
- We will use your data to provide our services as part of any contract you enter with us. We will use this data to contact you relating to your account and business you do with us.
- Personal data may also be used to see how you browse our website. We will use cookies to collect this information which may store your IP address. Some data is used for holistic purposes to improve the customer experience.
- We may use your personal data to deal with any complaints you may have with us.

Why does Spectrum Center need to collect and store personal data?

For us to provide you with a service, we need to collect personal data for providing that service. In any event, we are committed to ensuring that the information we collect, and use is appropriate for this purpose, and does not constitute an invasion of your privacy. In terms of being contacted for marketing purposes, Spectrum Center will provide you with information we think is relevant based on your service and previous purchases with us. You may object to your information being processed in this way. This only applies to existing business customers.

When you contact us through our “Contact Us” form on our website, we will process your data in order to provide a response to the question. If you tick the box for marketing, you will be added to our mailing list. You can opt out of marketing by clicking on the unsubscribe link in any of our marketing emails.

Will Spectrum Center share my personal data with anyone else?



We may pass your personal data on to third-party service providers contracted to Spectrum Center in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with Spectrum Center's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

How will Spectrum Center use the personal data it collects about me?

Spectrum Center will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavor to keep your information accurate and up to date, and not keep it for longer than is necessary. Spectrum Center is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will Spectrum Center contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. The information you provide will be subject to rigorous measures and procedures to minimize the risk of unauthorized access or disclosure.

Can I find out the personal data that the organisation holds about me?

Spectrum Center at your request, can confirm what information we hold about you and how it is processed. If Spectrum Center does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In most cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Spectrum Center or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has



approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.

- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

Spectrum Center accepts the following forms of ID when information on your personal data is requested:

Passport and driving license.

Document Owner and Approval

The GDPR Owner is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.