

Personal Information Protection

Introduction

KL Communications Ltd (“KL”/“We”) is committed to protecting and respecting your privacy. This document sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. You will also find information about how you can exercise your privacy rights. By using our Services you agree to KL using your personal information as described in this Privacy Policy.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

I. Information we collect from you and how we use it

We process Personal Information about the following types of individuals:

1. individuals who are our direct customers;
2. where our customer is a business or similar entity, individuals who are our customer’s employees, agents and other representatives;
3. suppliers who are hired by us to provide services to our customers on our behalf;
4. where our supplier is a business or similar entity, individuals who are our supplier’s employees, agents and other representatives; and
5. individuals who intend to or have participated in the training courses that we run.

We collect Personal Information about you when you voluntarily submit information directly to us. This can include information you provide to us when you fill in a form, correspond with us via the Website, phone, email or otherwise.

If you choose not to provide Personal Information, we may not be able to provide services to you or respond to our other requests.

The chart below sets out the categories of personal information that we may collect about you and the legal basis we rely on for this activity.



Category of Personal Information	How We Use it	Legal basis for the processing	Categories of recipients	Retention period
<p><u>Contact information and basic personal details.</u> Such as your name, phone number, address, domain name, e-mail address and, where applicable, employment information such as name of your company and the nature of your role, and your CV or resume.</p>	<p>We use this information to: communicate with you, sending statements and invoices, communications, news, alerts and marketing communications; deal with inquiries and complaints made by or about you relating to the services we provide; process applications where you have applied for attending training programmes or a job with us.</p>	<p>The processing is necessary for: the performance of a contract and to take steps prior to entering into a contract; and our legitimate interests, namely administering the service we provide, for processing job applications and for communicating with customers/suppliers .</p>	<p>As required in accordance with how we use it, we will share your Personal Information with the following:</p> <p>Service providers and advisors. Third party vendors and other service providers that perform services for us, on our behalf, which may include providing mailing or email services, HR services, tax and accounting services, payments processing, fraud prevention, web hosting, or providing analytic services.</p> <p>Purchasers and third parties in connection with a business transaction. Personal Information may be disclosed to third parties in connection with a transaction, such as</p>	<p>For no longer than necessary for the purposes set out and in accordance with our legal obligations and legitimate business interests.</p>
<p><u>Payment information.</u> Details such as your bank account number or PayPal account and related information.</p>	<p>We use this information to facilitate payment for use of our service.</p>	<p>The processing is necessary for the performance of our contract with you and our legitimate interests, namely ensure we/our suppliers are paid for the service we provide.</p>	<p>Purchasers and third parties in connection with a business transaction. Personal Information may be disclosed to third parties in connection with a transaction, such as</p>	



<p><u>Correspondence and comments.</u> When you contact us directly, e.g. by email, phone, mail, via our website, email or telephone, or complete an online form, we will record your comments and opinions.</p>	<p>To address your questions, issues and concerns and improve our services, to determine products and services that may be of interest to you. We may send you news, alerts and marketing communications.</p>	<p>The processing is necessary for our legitimate interests, namely communicating with customers/suppliers , improving our services to regular and new customers and for marketing purposes.</p>	<p>a merger, sale of assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business. Law enforcement, regulators and other parties for legal reasons.</p>	
<p>Immigration status. As a Tier 2 sponsor and employer, we may ask you to provide us with certain self-identifying information, including your passport information, visa status, British Residence Permit, or where you have applied for a job with us, you may voluntarily provide us with certain self-identifying information.</p>	<p>We use this information for regulatory purposes, fulfilling regulatory reporting requirements, responding to information requests and defending against employment related complaints.</p>	<p>The processing is necessary for: the compliance with legal and regulatory obligations; and our legitimate interests, namely defending against employment related complaints</p>		
<p>All Personal Information set out above.</p>	<p>We will use all the Personal Information we collect to operate, maintain and provide to you services offered by KL, to communicate with you, to monitor and improve our services, our Website and business, and to help us develop new products and services.</p>	<p>The processing is necessary for our legitimate interest, namely to administer and improve our services, our Website, our business and develop new services.</p>		

II. Storing your personal information

We implement and maintain appropriate technical and organizational measures to protect your Personal Information against accidental or unlawful destruction, loss, change or damage. All Personal Information we collect will be stored on secure servers or with third party service providers, which may include mailing or email services, tax and accounting services, payments processing, web hosting.

At the moment, only our Duty Manager and Managing Director Dr Kevin Lin OBE have access to any personal information you have provided.

III. Your Rights

In accordance with applicable privacy law, you have the following rights regarding Personal Information covered by the GDPR that we hold:

1. Right of access. The right to obtain access to your Personal Information.
2. Right to rectification. The right to obtain rectification of your Personal Information without undue delay where that Personal Information is inaccurate or incomplete.
3. Right to erasure. The right to obtain the erasure of your Personal Information without undue delay in certain circumstances, such as where the Personal Information is no longer necessary in relation to the purposes for which it was collected or processed.
4. Right to restriction. The right to obtain the restriction of the processing undertaken by us on your Personal Information in certain circumstances, such as where the accuracy of the Personal Information is contested by you, for a period enabling us to verify the accuracy of that Personal Information.

If you wish to exercise one of these rights, please contact us using the contact details at the end of this Privacy Policy.

IV. Changes to our Privacy Policy

This Privacy Policy will be reviewed periodically to take account of changes in the law and further guidance issued by the Information Commissioner.

V. Contact

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to mail@klcom.uk or +44 (0) 845 450 0721.