

1. Introduction

This Privacy Notice provides information about how Smartt Software Ltd ("Smartt") will use ("process") personal data about individuals with whom it engages.

2. About Smartt Software Ltd

Smartt develops, markets and supports the SMARTT suite of software applications. SMARTT (Smart Meals Administration, Recording & Transaction Tracking) enables community meals ("Meals on Wheels") service providers to administer their services, including management of clients, menus and delivery rounds.

3. Contact Details

Address: 64 Fleet Road, Farnborough, Hampshire, GU14 9RA

Phone Number: 0333 3 44 25 24

E-mail: tim@smarttsoftware.co.uk

This privacy notice was last updated on 29th January 2024.

4. Types of Personal Information

We currently collect and process the following information about individuals working for customers, suppliers and other organisations with which we engage:

- Name
- Phone number
- Email address

In addition, we process the following information about clients of our customers' meal services:

- Name
- Date of Birth
- Address, Email Address, Telephone number
- GP surgery details
- Information in relation to accessing property, including key safe numbers
- Dietary requirements and preferences, allergy information
- Information relating to the customer's physical or mental health or condition(s)
- Religion and ethnicity
- · Financial information including bank account details

Document Version 1.2



5. Collection and Reasons for Processing

5.1 How we get the personal information

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- Because you have expressed an interest in, or have purchased, our products or services
- Because you are supplying, or have expressed an interest in supplying, products or services
- Because both you and Smartt are involved in a project via a mutual customer or supplier

We also receive personal information indirectly from our customers where there is a need to process data on their clients and/or clients' next of kin, for the purposes of implementation or support of the SMARTT application suite.

5.2 How we use the personal information

We use the personal information in order to:

- Contact you about products or services
- Contact you about projects in which we are mutually involved
- Provide implementation and technical support services to our customers

5.3 Sharing of personal information

We may share this information with:

 Mirago Ltd (for book-keeping services including raising invoices and chasing outstanding debt)

Please note, this does not apply to personal data on our customers' clients or their next of kin, which will not be shared with any third parties.

5.4 Lawful Basis

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- (a) Your consent. You are able to remove your consent at any time. You can do this by contacting Smartt on 0333 3 44 25 24 or tim@smarttsoftware.co.uk.
- (b) We have a contractual obligation.

6. Storage and Retention

Your information is securely stored.



Our data retention policy for personal information is as follows:

We keep contact details of prospective customers and suppliers for twelve months
after that individual has last expressed an interest in working with Smartt. We then
dispose of the personal information by secure deletion.

We keep contact details of suppliers and customers for twelve months after the end
of the year during which that supplier/customer's contract with Smartt came to an end.
 We then dispose of the personal information by secure deletion.

We keep personal information relating to our customers' clients or next of kin for only
so long as is required to carry out the specific task for which the customer has engaged
us, for example until the support call is closed. We then dispose of any personal
information held on Smartt's systems by secure deletion.

7. Your Data Protection Rights

Under data protection law, you have the right to object to the processing of your personal information in certain circumstances.

Please contact us at tim@smarttsoftware.co.uk if you wish to make a request.

8. How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at tim@smarttsoftware.co.uk.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: https://www.ico.org.uk