

Privacy Notice

On the 25th May 2018 data privacy law is changing. On that date the EU General Data Protection Regulation will come into force.

This Privacy Notice explains how we handle your personal information. It includes:

- details on the types of personal information that we hold,
- how we use your personal information,
- the legal grounds on which we use your information, and
- your rights in relation to your personal information.

Please read this notice carefully and we will let you know if we make any further changes after the 25th May 2018.

Who are we?

CitiEU Consultancy Ltd (formerly V&B Software Services LTD) is a company registered in England & Wales. Our company number is 7061009. Our registered address is The Oriel, Sydenham Road, Guildford, Surrey GU1 3SR. Registered to the ICO (www.ico.org.uk) with registration number ZA386721.

How and on what basis do we collect, hold use and/or process personal information?

We will only collect, hold, use and/or process (together “process”) your personal information where we are legally allowed to do so. We will ensure that your personal information is:

- processed lawfully, fairly and transparently
- collected for specific, explicit and legitimate purposes
- adequate, relevant and limited to what is necessary for the purpose of the processing
- kept accurate and up to date
- only kept for so long as is necessary
- processed securely using appropriate technical and organisational measures to ensure integrity and confidentiality

For us, the lawful basis which we rely on will fall into one of the following:

- **Contractual performance:** *where we process your personal information for contractual performance*

This includes enabling us to take steps you request prior to us entering into a contract; and then once we have entered into a contract, to enable us to perform the contract

and to provide you with the products and services. We will process your personal information in accordance with the contract.

- Legitimate interests: *where we process your personal information for our legitimate interests*

We are a commercial organisation engaged in the provision of transport modelling systems and associated services. We have an interest in promoting, marketing, selling and supporting our products and services. Where we process your personal information for our interests we will do so only where we have carefully considered both our and your interests. We will not process your personal information if our interests are overridden by your interests or fundamental rights and freedoms.

- Consent: *where we rely solely on your consent to process your personal information*
There may be circumstances where we need to or are required to obtain and/or rely upon your consent to process your personal information. If this is the case we will give you:

- the reason for needing your consent, including details as to how we will process your information
- the choice as to whether to provide consent
- information to enable you to withdraw your consent

Why do we process personal information and how do we process it?

We process your personal information for a number of reasons. Primarily this will be to enable you to buy or use our products and services. We only process your personal information in accordance with the law, including the EU General Data Protection Regulation, as set out in this privacy notice.

Further information on these is set out below:

Example	Lawful Basis for processing
You are a customer	We will have entered into a contract with you in order to provide you with products, services, content or training
You use our website	To help inform you of our products and services. Where we process your information, we will do so with your consent
You contact us	The legitimate interests for processing information you provide us when you contact us on a specific enquiry is to enable us to address your query
If you are a supplier	We will have entered into a contract with you in order for you to supply us with products, goods or services

How do we process personal information?

Example	Where is the personal information captured
Where you are a customer	<ul style="list-style-type: none"> • In pre-contract discussions and correspondence • In contractual documents • When registering, using or receiving our products and services • Where we provide you with support and assistance in the use of our products and services
If you use our website	<ul style="list-style-type: none"> • Via cookies
If you are contacting us	<ul style="list-style-type: none"> • Typically, via email to one of our staff

What personal information do we process?

Depending on the circumstances for processing, personal information we process will include: title/salutation; name; date of birth; address; country or location; employer; e-mail addresses; telephone numbers; IP address and information obtained from that address; information we obtain from use of cookies on your computer.

We may also process other personal information about you when needed to provide data, software, products, services or other information that you requested. We will make you aware of what personal information we are processing at the time of when we obtain it.

We do not process any sensitive personal information about you. You should not provide us with any sensitive personal information. Any sensitive personal information provided to us will be deleted.

Who do we share your personal data with?

We will never sell your information to a third party.

We will share your information with a third party or transfer your data outside of the UK / EU if we need to. Where we do this, we will comply with all of our legal obligations and we ensure that there are adequate protections in place to protect your information.

We share contact information with our trading partners, Bentley Systems LTD, based in Ireland, and with Citilabs Middle East Consultancy LLC based in Abu Dhabi.

If we need your consent, we will:

- explain why we need to share your personal information
- explain the purpose for which we will be sharing it
- provide you with details of the third party
- obtain your explicit consent for such.

You will be able to easily withdraw your consent in the same way in which you gave it.

Where we rely on a different lawful basis, such as 'legitimate interests' or 'contractual', we will do so only to the extent permitted by such lawful basis.

How long do we keep your personal information?

- In all cases we will only keep your personal information for as long as we have a lawful basis for processing it.
- Where you enter into a contract and/or place an order, we will keep your information for the duration of the contract and/or order, and thereafter for such period as we are permitted by law (to comply with financial legislation), or for so long as is necessary for the establishment, exercise or defence of legal claims.
- Where you have made a general or specific enquiry but have not entered into a contract or placed an order with us, we will keep your information until that enquiry is resolved.
- Where you have expressly consented to and/or subscribed to marketing, newsletters, events information or to any other form of communication, we will keep your information only whilst your consent and/or subscription is valid.

Where we no longer need your information and no longer have a basis for keeping it, we will delete it within 12 months.

How do we secure your personal data?

We place a great deal of importance on the security of all personal information. We have in place appropriate technical and security measures which are reviewed routinely. Our computers and laptops are protected by encryption software such as (and not only) OS X Filevault and Microsoft Bitlocker. Our portable devices are protected by biometric access technologies. Sensitive data are regularly backed up on cloud services such as Microsoft OneDrive and Dropbox.

Your rights, including your right to object and right to withdraw consent

Your rights include the right to:

- Basic information (such as our identity, or that of the controller if not us, the reason and basis on which we process your personal data, together with as much information to ensure fairness and transparency) and to be informed
- Object: to object to processing of personal data where such is done by us in certain circumstances, for example for our legitimate interests or direct marketing
- Withdraw consent: to withdraw your previously given consent
- Access: to be aware of and verify the lawfulness of the processing
- Rectification: to correct personal data if it is inaccurate or incomplete
- Erasure: to request the removal or deletion of personal data
- Restrict processing: to restrict the processing of personal data
- Data portability: to obtain and reuse personal data
- Be aware of any automated decision making or profiling, and to request such is restricted

If you wish to object or to withdraw consent, you may contact us through one of the methods detailed below in the 'Contact us' section.

Concerns or complaint?

If you have a concern or complaint about our processing of your personal information, then you may contact us through one of the methods detailed below. We will endeavour to resolve or address your concern or complaint. If we are not able to do so you may be entitled to complain to the supervisory authority and/or seek a remedy through the courts.

Contact us

Contact us at privacy@vandb.eu if you want to discuss how or why we hold personal information about you, what personal information we hold about you, or request your personal information to be amended or deleted.