

Privacy Policy Introduction

CLICKS MEDIA SOLUTIONS LTD is committed to protecting and respecting your privacy in accordance with the UK Data Protection Act 2018 (DPA 2018), the UK General Data Protection Regulation (UK GDPR), and the Privacy and Electronic Communications Regulations 2003 (PECR). This document explains how we use and protect your personal information.

The Laws and Regulations

We comply with:

- The UK Data Protection Act 2018
- The UK General Data Protection Regulation
- The Privacy and Electronic Communications Regulations 2003 (PECR)

CLICKS MEDIA SOLUTIONS LTD, address Dept 1462a, 43 Owston Road, Carcroft, Doncaster, United Kingdom, DN6 8DA, email dpo@clicksm mediasol.com (hereinafter "Company")

Changes to Our Privacy Policy

We may change this notice from time to time. Any such changes will be posted on the website <https://alfaleads.net/>. For significant changes, we will notify you directly where possible.

Data Protection Principles

Under the UK GDPR and DPA 2018, we must comply with these principles:

1. Lawfulness, fairness and transparency
2. Purpose limitation
3. Data minimization
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality (security)
7. Accountability

Personal Data We Process

When collecting personal data, we will provide you with:

- Our identity and contact details
- Our Data Protection Officer's details
- The purposes and legal basis for processing
- The legitimate interests (where applicable)
- Any recipients of personal data
- Details of international transfers and safeguards
- Retention periods
- Your rights under UK law
- The right to withdraw consent
- The right to lodge a complaint with the ICO
- Whether providing personal data is a statutory/contractual requirement
- Any automated decision-making

Legal Bases for Processing

We process personal data only when we have a valid legal basis:

1. Consent

2. Contract performance
3. Legal obligation
4. Vital interests
5. Public task
6. Legitimate interests

Personal Data We Use and Purposes

Personal data We collect directly from you:	Legal basis for processing	Purposes for processing, Reason for collection
1. Full name	Contractual necessity. We will store just limited information to respect your opt-out preference.	You know our name, we require yours for the answer to the question you left in the contact form.
2. Email	1) Contractual necessity and	1) We require your email to log you into the system and to provide you with an answer, communications and other important information.
	2) Our legitimate interests, if related to marketing	2) If We do use your email to contact you for marketing purposes, it will be in Our legitimate interests to do so, but you will always have a chance to opt out of such marketing communications. You may opt out at any time by emailing dpo@clicksm mediasol.com.
	3) Marketing Communications	3) We will collect your email for the purpose of sending you promotional and marketing information. We will obtain your explicit consent for such communications, and you will always have the opportunity to withdraw your consent by opting out.

The rest is the technical information that must be processed in order to provide you with our services.

Personal Data collected/accessed by Us automatically	Legal basis for processing
1. Internet Protocol (IP) address	Contractual necessity. You need this to connect to the Internet.
2. We set and access various cookies* on your device	Contractual necessity. Your consent prior to the placement of all the other types of cookies.

* This is a piece of information that is automatically transmitted from your electronic device when you use your browser. More information about what kind of information your browser transmits can be found on the sites of the browser companies (for example, [Chrome](#)). You can disable the transfer of cookies at any time in the browser settings.

Special Category Data

If we process special category data (e.g., health data, biometric data), we will:

1. Identify both a legal basis from Article 6 UK GDPR
2. Meet one of the specific conditions in Article 9 UK GDPR
3. Document our assessment
4. Implement appropriate safeguards

Your Rights Under UK Law

You have the right to:

1. Be informed about how we use your personal data
2. Access your personal data
3. Have your personal data rectified
4. Have your personal data erased
5. Restrict processing
6. Data portability
7. Object to processing
8. Rights relating to automated decision making and profiling

We will respond to your requests within one month, unless complex or numerous, in which case we may need up to three months.

Direct Marketing

Under PECR, we will:

1. Obtain specific consent for electronic marketing
2. Provide opt-out options in all marketing communications
3. Maintain a "do not contact" list
4. Honor marketing preferences without delay

International Data Transfers

For transfers outside the UK, we ensure:

1. Adequacy regulations are in place
2. Appropriate safeguards exist (UK Standard Contractual Clauses)
3. Specific derogations apply
4. Documentation of transfer impact assessments

Data Protection Impact Assessments

We conduct DPIAs when:

1. Using new technologies
2. Processing is likely to result in high risk
3. Processing special category data on a large scale
4. Systematic monitoring of public areas

Data Breach Response

If a breach occurs, we will:

1. Report to the ICO within 72 hours if risk is likely
2. Notify affected individuals if high risk
3. Document all breaches in our internal register
4. Implement remedial measures

Data Protection Officer

Our DPO's responsibilities include:

- Monitoring compliance
- Advising on data protection obligations

- Training staff
- Conducting audits
- Cooperating with the ICO
- Acting as a contact point

Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

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