# **Privacy Policy**

## Last Updated October 2018

Neil Williams IT Consultancy Ltd is dedicated to protecting the confidentiality and privacy of information entrusted to us. We comply with the EU General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018. Please read this Privacy Policy to learn about your rights, what information we collect, how we use and protect it.

This website is operated by Neil Williams IT Consultancy Ltd ("we" or "us"), a Registered Company in England and Wales No. 07724862.

#### 1. Who are we?

This Privacy Policy applies to Neil Williams IT Consultancy Ltd.

## 2. Who can you contact for privacy questions or concerns?

If you have questions or comments about this Privacy Policy or how we handle personal data, please direct your correspondence to: Neil Williams IT Consultancy Ltd, 14 Fern Ley Close, Market Harborough, Leicestershire, LE16 8FY or

email <u>dataprotection@nwilliamsitconsultancy.co.uk</u>. We aim to respond within 30 days from the date we receive privacy-related communications.

You may contact the UK Information Commissioner's Office

at <a href="https://ico.org.uk/concerns/handling/">https://ico.org.uk/concerns/handling/</a> to report concerns you may have about our data handling practices.

#### 3. How do we collect personal data?

- Directly We obtain personal data directly from individuals in a variety of ways, including
  obtaining personal data from individuals who provide us their business card or complete
  our online forms. We may also obtain personal data directly when, for example, we are
  establishing a business relationship or performing professional services through a
  contract.
- Indirectly We obtain personal data indirectly about individuals from a variety of sources. We may attach personal data to our customer relationship management records to better understand and serve our business clients, individuals, satisfy a legal obligation, or pursue our legitimate interests.
  - Public sources Personal data may be obtained from public registers (such as Companies House), news articles, sanctions lists, and Internet searches.

## 4. What categories of personal data do we collect?

We may obtain the following categories of personal data about individuals through direct interactions with us, or from information provided through client engagements, from applicants, our suppliers and through other situations including those described in this Privacy Policy.

- Personal data Below is a list of personal data we typically collect to conduct our business activities.
  - Contact details (e.g., name, company name, job title, work and mobile telephone numbers, work and personal email and postal address).

- **Sensitive personal data** We typically do not collect sensitive or special categories of personal data about individuals.
- Child data We typically do not collect information from individuals under 13 years of age.

## 5. What lawful reasons do we have for processing personal data?

We may rely on the following lawful reasons when we collect and use personal data to operate our business and provide our products and services:

- **Contract** We may process personal data in order to perform our contractual obligations.
- **Consent** We may rely on your freely given consent at the time you provided your personal data to us.
- **Legitimate interests** We may rely on legitimate interests based on our evaluation that the processing is fair, reasonable and balanced. These include:
  - Delivering services to our clients To deliver the professional services our clients have engaged us to provide.
  - Direct marketing To deliver timely market insights and speciality knowledge we believe is welcomed by our business clients, subscribers and individuals who have interacted with us.
- **Legal obligations and public interests** We may process personal data in order to meet regulatory and public interest obligations or mandates.

## 6. Why do we need personal data?

We aspire to be transparent when we collect and use personal data and tell you why we need it, which typically includes:

- Providing professional advice and delivering reports related to our professional services.
   Our services may include reviewing client files for quality assurance purposes, which may involve processing personal data for the relevant client.
- Promoting our professional services, products and capabilities to existing and prospective business clients.
- Sending invitations and providing access to guests attending our events and webinars or our sponsored events.
- Administering, maintaining and ensuring the security of our information systems, applications and websites.
- Processing online requests, including responding to communications from individuals or requests for proposals and quotations.

#### 7. Do we share personal data with third parties?

We may occasionally share personal data with trusted third parties to help us deliver efficient and quality services. These recipients are contractually bound to safeguard the data we entrust to them. We may engage with several or all of the following categories of recipients:

- Parties that support us as we provide our.
- Our professional advisers, including lawyers, auditors and insurers.

- Payment services providers.
- Marketing services providers.

#### 8. Do we transfer your personal data outside the European Economic Area?

We store personal data on servers located in the UK.

#### 9. Do we use cookies?

Our website may use cookies, where they are used, a statement will be sent to your browser explaining the use of cookies.

## 10. What are your data protection rights?

Your data protection rights are highlighted here. To submit a data request please email <a href="mailto:dataprotection@nwilliamsitconsultancy.co.uk">dataprotection@nwilliamsitconsultancy.co.uk</a>

- Access You can ask us to verify whether we are processing personal data about you, and if so, to provide more specific information.
- **Correction** You can ask us to correct our records if you believe they contain incorrect or incomplete information about you.
- Erasure You can ask us to erase (delete) your personal data after you withdraw your
  consent to processing or when we no longer need it for the purpose it was originally
  collected.
- Processing restrictions You can ask us to temporarily restrict our processing of your
  personal data if you contest the accuracy of your personal data, prefer to restrict its use
  rather than having us erase it, or need us to preserve it for you to establish, exercise, or
  defend a legal claim. A temporary restriction may apply while verifying whether we have
  overriding legitimate grounds to process it. You can ask us to inform you before we lift
  that temporary processing restriction.
- **Data portability** In some circumstances, where you have provided personal data to us, you can ask us to transmit that personal data (in a structured, commonly used, and machine-readable format) directly to another company if is technically feasible.
- **Right to Object to Direct Marketing including Profiling** You can object to our use of your personal data for direct marketing purposes, including profiling. We may need to keep some minimal information to comply with your request to cease marketing to you.
- **Right to Withdraw Consent** You can withdraw your consent that you have previously given to one or more specified purposes to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. It may mean we are not able to provide certain products or services to you and we will advise you if this is the case.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information or to exercise any of your other rights. This helps us to ensure that personal data is not disclosed to any person who has no right to receive it. No fee is required to make a request unless your request is clearly unfounded or excessive. Depending on the circumstances, we may be unable to comply with your request based on other lawful grounds.

#### 11. What about personal data security?

We have put appropriate technical and organisational security policies and procedures in place to protect personal data (including sensitive personal data) from loss, misuse,

alteration or destruction. We aim to ensure that access to your personal data is limited only to those who need to access it. Those individuals who have access to the data are required to maintain the confidentiality of such information. We may apply pseudonymisation, deidentification and anonymisation techniques in efforts to further protect personal data.

Please be aware that the transmission of data via the Internet is not completely secure. Whilst we do our best to try to protect the security of your personal data, we cannot ensure or guarantee the security of your data transmitted to our site; any transmission is at your own risk.

## 12. How long do we retain personal data?

We retain personal data to provide our services, stay in contact with you and to comply with applicable laws, regulations and professional obligations that we are subject to. Unless a different time frame applies as a result of business need or specific legal, regulatory or contractual requirements, where we retain personal data in accordance with these uses, we retain personal data for seven years. We will dispose of personal data in a secure manner when we no longer need it.

#### 13. Do we link to other websites?

Our websites may contain links to other sites. Please review the destination websites' privacy policies before submitting personal data on those sites. Whilst we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content, security, or privacy practices employed by other sites.

#### 14. Do we change this privacy policy?

We regularly review this Privacy Policy and will post any updates to it on this webpage. This Privacy Policy was last updated October 2018.