

Privacy Policy, GDPR compliant

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who **we** are and how and why **we** collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact **us** or supervisory authorities in the event you have a complaint.

When **we** use your personal data **we** are regulated under the General Data Protection Regulations (GDPR) which apply across the European Union (including in the United Kingdom) and **we** are responsible as ‘controller’ of that personal data for the purposes of the GDPR. **Our** use of your personal data is subject to your instructions, the GDPR, other relevant UK and EU legislation and our professional duty of confidentiality.

Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Connections International Limited trading as Connections2b
Privacy Officer	Paul Harvey Paul.harvey@connections2b.co.uk
Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data Data concerning health, sex life or sexual orientation

Personal data we collect about you

The table below sets out the personal data **we** will or may collect in the course of working with you.

Personal data we will collect
<ul style="list-style-type: none"> ○ Your name, address and telephone number ○ Electronic contact details e.g. your email address and mobile phone number ○ Information about your use of our IT, communication and other systems, and other monitoring

This personal data is required to enable **us** to provide **our** service to you. If you do not provide personal data **we** ask for, it may delay or prevent **us** from providing services to you.

How your personal data is collected

We collect most of this information from you. However, we may also collect information:

- from publicly accessible sources, e.g. Companies House;
- via our information technology (IT) systems, e.g.:
 - membership management, document management and training systems;
 - door entry systems and reception logs;
 - automated monitoring of our websites and other technical systems, such as our computer networks and connections, communications systems, email and instant messaging systems;

How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason for doing so, e.g.:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal data for and our reasons for doing so:

What we use your personal data for	Our reasons
To provide business advice, training and networking	For the performance of our contract with you or to take steps at your request before entering into a contract
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, ie to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, ie to protect our intellectual property and other commercially valuable information To comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, e.g. in relation to our financial performance, client base, work type or other efficiency measures	For our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best service for you at the best price
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party, ie to prevent and detect criminal activity that could be damaging for us and for you To comply with our legal and regulatory obligations

What we use your personal data for	Our reasons
Updating and enhancing client records	<p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our clients about existing and new services</p>
Ensuring safe working practices, staff administration and assessments	<p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you</p>
<p>Marketing our services to:</p> <ul style="list-style-type: none"> ○ existing and former clients; ○ third parties who have previously expressed an interest in our services; ○ third parties with whom we have had no previous dealings. 	<p>For our legitimate interests or those of a third party, ie to promote our business to existing and former clients</p>
<p>External audits and quality checks, e.g. for ISO or Investors in People accreditation and the audit of our accounts</p>	<p>For our legitimate interests or a those of a third party, ie to maintain our accreditations so we can demonstrate we operate at the highest standards</p> <p>To comply with our legal and regulatory obligations</p>

The above table does not apply to special category personal data, which **we** will only process with your explicit consent.

Promotional communications

We may use your **personal data** to send you updates (by email, text message, telephone or post) about business developments that might be of interest to you and/or information about **our** services, including exclusive offers, promotions or new services.

We have a legitimate interest in processing your **personal data** for promotional purposes (see above ‘**How and why we use your personal data**’). This means **we** do not usually need your consent to send you promotional communications. However, where consent is needed, **we** will ask for this consent separately and clearly.

We will always treat your **personal data** with the utmost respect and never sell or share it with other organisations for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

- contacting **us** by email to paul.harvey@connections2b.co.uk or by post to 141 South Road, Haywards Heath, RH16 4LY
- using the ‘unsubscribe’ link in emails or ‘STOP’ number in texts

We may ask you to confirm or update your marketing preferences if you instruct **us** to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

Who we share your personal data with

We routinely share personal data with:

- professional advisers who **we** instruct on your behalf or refer you to, e.g. solicitors, medical professionals, accountants, tax advisors or other experts;
- **our** insurers and brokers;
- external auditors, e.g. in relation to quality or accounts audits
- **our** banks;
- external service suppliers, representatives and agents that **we** use to make **our** business more efficient, e.g., accountants, experts, marketing agencies, document collation or analysis suppliers;

We only allow **our** service providers to handle your **personal data** if **we** are satisfied they take appropriate measures to protect your **personal data**. **We** also impose contractual obligations on service providers relating to ensure they can only use your **personal data** to provide services to **us** and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with **our** legal and regulatory obligations.

We may also need to share some **personal data** with other parties, such as during a re-structuring or acquisition of another firm. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We will not share your **personal data** with any other third party.

Where your personal data is held

Information may be held at **our** offices and/or at its external storage/archive facilities, third party agencies, service providers, representatives and agents as described above (see '**Who we share your personal data with**').

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your **personal data** when this occurs, see below: '**Transferring your personal data out of the EEA**'

How long your personal data will be kept

We will keep your **personal data** after **we** have finished advising or acting for you. **We** will do so for one of these reasons:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.

We will not retain your data for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of data. Further details on this are available in our Privacy Notice.

When it is no longer necessary to retain your **personal data**, **we** will delete or anonymise it.

Transferring your personal data out of the EEA

To deliver services to you, it is sometimes necessary for us to share your **personal data** outside the European Economic Area (EEA), e.g.:

- with your and **our** service providers located outside the EEA;
- if you are based outside the EEA;
- where there is an international dimension to the matter in which we are advising you.

These transfers are subject to special rules under European and UK data protection law.

If you would like further information please contact **Privacy Officer**: email to privacy@parfittcresswell.com or write to 141 South Road, Haywards Heath, RH16 4LY (see 'How to contact us' below).

Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
To be forgotten	The right to require us to delete your personal data —in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data —in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us , in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: <ul style="list-style-type: none">○ at any time to your personal data being processed for direct marketing (including profiling);○ in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact **us** or see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- email, call or write to **our Privacy Officer**: email to privacy@parfittcresswell.com or write to 141 South Road, Haywards Heath, RH16 4LY; and
- let **us** have enough information to identify you e.g. your full name, address and business name;
- let **us** have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let **us** know what right you want to exercise and the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures to prevent **personal data** from being accidentally lost, or used or accessed unlawfully. **We** limit access to your **personal data** to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. **We** will notify you and any applicable regulator of a suspected data security breach where **we** are legally required to do so.

[If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

The GDPR also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

Changes to this privacy policy

This privacy policy was published on 14th May 2018.

We may change this privacy policy from time to time, when we do we will inform you our website or by direct communication with you.

How to contact us

Please contact our **Privacy Officer** by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Our contact details
141 High Street Haywards Heath RH16 4LY Paul.harvey@connections2b.co.uk 01444 228224

Do you need extra help?

If you would like this policy in another format (for example audio, large print, braille) please contact us (see 'How to contact us' above).