

This policy sets out how DJH Bridgnorth Consulting Ltd uses personal data and how we collect data from you when you use our website.

1. Your Right to Information

As a Data Controller, we value your rights to understand how we store and use any of your data, including its origin and recipients. We will never sell your personal data to any third-party organisation for any purpose.

This privacy policy sets out information regarding how and what personal data is collected and processed, why it is collected and who it is shared with, the lawful basis for processing and our retention strategy.

We encourage you to contact us regarding any questions or concerns you may have regarding the information within this notice or, more generally, any aspect of our processing of your personal data, using the address below:

Data Protection Officer

DJH Bridgnorth Consulting

33 The Hobbins

The Hobbins

Bridgnorth

Shropshire

WV15 5HH

If you do not feel that we adequately answer your questions or remedy your concerns, you have the right to make a complaint to an appropriate supervisory body. Within the UK, you can contact the Information Commissioner's Office at ico.org.uk/concerns/

2. What data do we collect

We endeavour to always collect, use and store the minimum personal data necessary during the course of our normal business. We collect the following types of data:

- a. For activities related to product and services we offer or may purchase from you, this data may include full name, gender, address, email addresses, links to professional profiles on social media, phone numbers, job & professional titles, company name, department, product & service interests, contact preferences and miscellaneous information shared during engagement.
- b. If we enter into a contract with you, we record sufficient data to undertake our contract with you. Such as billing address, delivery address, company name, email address and contact telephone numbers, bank account and payment card details. This includes project correspondence, technical work history, feedback to client surveys and attendance at any events and courses we are involved in organising or marketing. This information will be further minimised once the purchase has been made unless you request otherwise. Transactional data such as payments to and from you regarding provision of services or products will be recorded.



- c. If you are interested in working for us as an employee, contractor or associate, we process additional personal data regarding your qualifications, experience, references, nationality, ethnicity and other selected demographic and special category information as required.
- d. During your visits to our website, we may also automatically collect, for the computer you are using, IP address, platform, operating system, internet browser profile and clickstream history, such as how you got to our site and how long you spent on each page. However, we do not cross-reference this data against your other personal information, such as name and address, and therefore it cannot be used to identify who you are.
- e. When you respond to our direct marketing email communications, we record whether you open or delete the message and whether you click on an embedded link to our or third party websites.
- f. If you access our client area we record username, email address, passwords, interests and preferences, any feedback and survey responses and data accessed.

3. How do we collect data

We may receive or collect your personal data through various means:

- a. You are purchasing our services or products online.
- b. You are voluntarily registering interest online.
- c. You are emailing, phoning, using LiveChat or posting social media messages to us directly with an enquiry or technical support question.
- d. You are registering for and/or attending our events, including webinars, seminars and training courses.
- e. You are visiting our website via your browser's cookies.
- f. You are opening or acting on our direct marketing communications.
- g. You are exchanging business cards.
- h. You are providing feedback on our products and services.
- i. You are contacting us by social media.
- j. Us contacting you by phone, email or social media.
- k. Us receiving information on you from suppliers, marketers, advertisers, analytics providers, internet search engines, social media, websites and other third parties.
- I. Us holding conversations with you at meetings, conferences, exhibitions, trade shows and other events.

4. How we use your data

We may use your data in a number of ways to:

- a. Fulfil any obligations regarding contracts we have entered, or intend to enter, into with you.
- b. Manage our relationship with you including any administration.
- c. Provide our suppliers and associates with sufficient information to fulfil any contracts or offers that we have discussed with you.
- d. Keep you informed of products and services that you have previously purchased from us or enquired about.
- e. Provide you with related information to the above that we believe is of interest and may benefit your organisation.
- f. Notify you of any changes to our organisation, products or services.
- g. Improve the design of our website



- h. Improve the quality, relevance and performance of our email and other communications, including personalised, targeted and location-based content.
- i. Undertake research and market analysis to inform our company strategies.
- j. Assess the accuracy of the data we hold on you and verify using third parties.
- k. Identify and assess any activity that may potentially be illegal, unlawful or harmful.
- I. Enforce our Privacy Policy and any Terms of Business.
- m. Manage our recruitment processes.
- n. We may send your data to credit reference agencies to prevent fraudulent purchases.

Our lawful basis for processing your personal data will typically be our **Legitimate Business Interests** although we may alternatively rely on **Contract**, **Legal Obligation** or **Consent** for specific data and uses.

Our company will not openly share your data with other businesses other than the above stated reasons for use.

5. Storage and Retention of data

We may use your personal data in aggregate to inform our marketing strategies and further develop our products and services and to retain a suppression record.

In the event of you exercising your **Right to Erasure** or objecting to our **direct marketing** by unsubscribing, we may keep a record of your wishes, based upon the minimum necessary personal data, to ensure we continue to comply.

We segregate any data we collect to store as appropriate within our Customer Relationship Management (CRM) system, mailboxes and server-based and local file systems. Segregation is based upon considerations of its use and purpose and our legal and contractual obligations. We periodically archive data in order to fulfil such obligations while no longer required or accessible for current use.

The duration your data will be stored depends on the nature and purpose for which it was collected, considering any legal or contractual obligations, tax, accounting, regulatory requirements or the interest you may have shown in our services. We periodically review our data to ensure it is still lawful and appropriate to retain. If it fails this assessment, we will delete it if practically possible.

We endeavour to ensure our data is accurate through the information you supply, providing you with access via our email marketing to update your records directly and by regularly reviewing your engagement with us.

Please contact our Data Protection Officer at the address above if you would like further details on our data retention policies.

6. Marketing

Our company would like to send you information about products and services of ours that we think you might like.

If you have voluntarily agreed to receive marketing, you may always opt out at a later date.

You have the right at any time to stop DJH Bridgnorth Consulting Ltd from contacting you for marketing purposes.

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If you no longer wish to be contacted for marketing purposes, please contact us at the above address or click here.

7. Your data protection rights

Our company would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following.

7.1. Right to access

You have the right to request our company for copies of your personal data. We reserve the right to charge you a small fee for this administration service.

We respect your right to understand and view the personal data we hold on you, including the lawful basis we are applying to justify its processing.

You can obtain access by submitting a **Subject Access Request (SAR)** in writing to our Data Protection Officer. Please select the link below for more details on how to make a SAR and a convenient form you may wish to use.

We will respond as soon as practically possible and, at the latest, within one month of receipt unless the request is deemed overly complex or we have received multiple requests from you. In such cases, we may request an extension from you for an additional two months.

7.2. Right to Rectification

You have the right to request that our company corrects any information you believe is inaccurate. You also have the right to request our company to complete information that you believe is incomplete.

We encourage you to exercise your right to **correct any incomplete or inaccurate information** we hold on you by contacting us by email or post using the details above.

We will respond as soon as practically possible and, at the latest, within one month of receipt unless the request is deemed overly complex or we have received multiple requests from you. In such cases, we may request an extension from you for an additional two months. No fee will normally apply although we reserve the right to cover our administration costs with a reasonable fee if the request is considered unfairly repetitive, unfounded, or excessive.

Please Note: As an additional facility, our direct marketing emails include the option within the footer for you to correct your own contact information as it is stored within our Customer Relationship Management (CRM) system.

7.3. Right to Restrict Processing

You can request that we **suspend** the use of your personal data while we work with you to **establish its accuracy, purpose and reason for processing**. Please contact us using the details in <u>Section 1</u>.

During the suspension period, apart from storage, we will not process your data further without your consent unless we are obliged to for legal or public interest reasons.

We will respond as soon as practically possible and, at the latest, within one month of receipt unless the request is deemed highly complex or we have received multiple requests from you. In such



cases, we may request an extension from you for an additional two months. No fee will normally apply although we reserve the right to cover our administration costs with a reasonable fee if the request is considered unfairly repetitive, unfounded, or excessive.

Please Note: As an additional facility, our direct marketing emails include the option within the footer for you to manage your own contact preferences, as stored within our Customer Relationship Management (CRM) system, including unsubscribing from our email campaigns.

7.4. Right to Object

You can **object to our processing** of your data if our justification is based on **Legitimate Interests**, including **direct marketing** and **profiling**. Please contact us using the details above to raise and discuss your objection.

We respect that if you are objecting to direct marketing, we will cease the activity forthwith and update your personal data accordingly.

7.5. Right to Erasure

You have the right to request that our company erases your personal data, under certain conditions.

We will always **delete** personal data that does not pass our periodic assessments in terms of lawful basis or accuracy.

However, you can **explicitly ask us to delete** your personal data by simply contacting us verbally or in writing using the details above.

We will agree to your request entirely unless by doing so we are compromising any contractual or legal obligations. If we agree, we will endeavour to permanently erase all personal data that we can reasonably locate and retrieve. As permitted, minimum details may be retained within a suppression file in order we can keep a record of your wishes and avoid any resurrection of your data at a future time.

We will respond as soon as practically possible and, at the latest, within one month of receipt unless the request is deemed highly complex or we have received multiple requests from you. In such cases, we may request an extension from you for an additional two months. No fee will normally apply although we reserve the right to cover our administration costs with a reasonable fee if the request is considered unfairly repetitive, unfounded, or excessive.

Please Note: Unsubscribing from our direct marketing emails does not automatically mean we will delete your personal data. Please communicate your request to be erased as described above.

7.6. The right to restrict processing

You have the right to object to our company's processing of your personal data, under certain conditions.

7.7. Right to Data Portability

You have the right to request that our company transfers the data that we have collected to another organisation, or directly to you, under certain conditions.



You can ask us to **move, copy or transfer any personal data** you have specifically given to us. Please contact us using the details above.

If electronically stored, we will supply this data free of charge in a common, open format such as CSV.

We will respond as soon as practically possible and, at the latest, within one month of receipt unless the request is deemed overly complex or we have received multiple requests from you. In such cases, we may request an extension from you for an additional two months.

7.8. Right related to Automated Decision-Making & Profiling

We may **create a profile** of you in terms of your interests in, and the relevance of, our services. This is to ensure the decisions we make regarding communications we have with you are as appropriate as possible.

Within any direct marketing emails that you may receive from us, there is the option within the Footer for you to customise your own contact preferences.

If you would prefer not to be subject to profiling or would like to adjust or rectify your profile, please contact us using the details above.

7.9. Right to Complain

If we are unable to comply with any of your requests discussed, you have the right to complain or appeal to the appropriate authorities. Within the UK, you should make a complaint to the Information Commissioner's Office (ICO). Details can be found at ico.org.uk/concerns

8. Legitimate Business Interests

Our **Legitimate Business Interests** for collecting, retaining and using your data are as follows:

To successfully maintain and grow our business.

We will endeavour to maintain our existing relationship with you by keeping you informed of our business offerings through **direct marketing** until you indicate otherwise. You can ask us to stop sending technical and marketing communications at any time by choosing the "Unsubscribe" option within our emails or by contacting us. If we do not have an existing relationship with you, we will ask for your **Consent** first.

• To provide the best possible response to your enquiries

We will collect and use your personal data to help understand your requirements and maintain communication when answering your requests for service information including proposals and general support.

• To monitor our services over a period of time.

We may evaluate our responses to your questions and the feedback received from you. In addition to improving our performance, this data may be used within our quality management auditing processes.

To analyse our targeted industries and company engagements



8.1. Contract

Our lawful basis will be **Contract** when we have entered an agreement, or are in discussion with you regarding an agreement, with your organisation, or with you personally, to supply or receive products and services. This basis will continue while we have obligations or professional duties to keep you informed of any variations, revisions or other changes that may have implications for the contract.

8.2. Legal Obligation

Our lawful basis will be **Legal Obligation** when we are legally required to process or retain your personal data to fulfil our obligations.

8.3. Consent

Our lawful basis will be **Consent** when this is the most appropriate basis for our engagement. This will include prior to **direct marketing** if we have not previously sent you marketing communications or when we are in contact with you regarding our products and services as an individual rather than as a representative of an organisation.

If we are using **Consent** as our basis for processing some or all of your personal data, you can withdraw your consent at any time and we will delete the respective data in respect of your **Right to Erasure**.

9. With whom we share your data and why

Outside of our company, we may disclose your personal data to authorities as required to comply with our legal obligations, laws and if it is in the public interest.

We may also share your data with suppliers, partners, associates and contractors inside or outside of the United Kingdom for the strict purpose of our legitimate interests or fulfilment of contracts with you. The lawful basis for their processing will be their own legitimate interests or contractual or legal obligations as a data controller or processor.

If part or all of our company is ever sold, your data may be transferred to the new owner as a business asset.

10. Security

We undertake our very best endeavours to ensure your personal data is secure once received, restricting access as appropriate.

We have in place strict security measures and procedures to endeavour to protect any information collected and stored from any unauthorised access from within or outside of our company.

11. Cookies

11.1. What are Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. When you visit our website(s), we may collect information from you automatically through cookies or similar technology.



For further information, visit <u>allaboutcookies.org</u>, <u>aboutcookies.org</u>, en.support.wordpress.com/cookies.

11.2. How we use cookies

Our company uses cookies in a range of ways to improve your experience on our website including:

- Keeping you signed in.
- Understanding how you use our website.
- Measuring how many are using the services we provide, so we can make them easier and faster for you to use.
- Analysing data, anonymously, to help us understand how you use our website.
- Providing live chat and social sharing services.

11.3. Website Plug-Ins, Cookies and Tracking

Our website is based on the WordPress platform, using Event Espresso plug-in for event management and other miscellaneous plug-ins to improve performance.

We use "Cookies" which are small text files that are put on your computer when you visit our website. These Cookies enable your device to be recognised and information to be collected about your actions when on our website. More general information on Cookies can be found at en.support.wordpress.com/cookies and aboutcookies.org.

What types of cookies do we use.

There are a number of different types of cookies however our website uses:

Functionality- Our Company uses these cookies so that we recognise you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first -party and third-party cookies are used.

Advertising- Our company uses these cookies to collect information about your browser, device, and IP address. Our company sometimes share s some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on our website.

First-Party Cookies are those set by the website while Third-Party Cookies are set by alternative domain or website. We include both first-party and third-party Cookies to enable us to improve our services to you, including:

- Measuring how many are using the services we provide, so we can make them easier and faster for you to use.
- Analysing data, anonymously, to help us understand how you use our website.
- Providing live chat and social sharing services.

For more information about how to remove Cookies from your device, or how to block individual Cookies from being received, please see the guidance and instructions at ico.org.uk/for-the-public/online/cookies/



By continuing to use our website without changing your browser settings, you are agreeing to our use of Cookies.

11.4. Third-Party Services & Cookies

Some third-party services on our website may use your data for behavioural advertising unless you choose otherwise. Please refer to the EDAA opt-out program at <u>youronlinechoices.com</u> for details of how to Opt-out of such services.

We use **Google Analytics** (a web analytics service provided by Google, Inc.) to help us understand how visitors use our site and how we can improve the experience in the future. Information obtained through Cookies on how you use our website (including your IP address) is captured and stored by Google. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. Please refer to Google's privacy policies at policies google.com/privacy for more details.

By continuing to use our website, you are consenting to the processing of data about you by Google in the manner and for the purposes set out above.

We provide convenient access to **YouTube** (https://www.youtube.com) via sharing buttons which involves use of cookies. Please refer to Google's cookie policy at https://policies.google.com/technologies/cookies

By continuing to use any of the above services on our website, you are consenting to their use of your data as described in their privacy policies and you take responsibility for Opting-out from their services.

11.5. How to manage Cookies

You can set your browser not to accept cookies, and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

12. Social Sharing Links

Our website, email and other electronic communications may include social sharing capabilities developed by third parties and connected to sites of social networking providers, such as LinkedIn. For the avoidance of doubt, we cannot guarantee your browser will not submit any personal data to those providers which would thereby extend the processing of your data beyond our company.

If you have any questions or concerns regarding this activity, please refer to the privacy policies of any social sharing plug-in and networking providers accessible via our communications before selecting a social sharing button or link. Their policies should inform you of your rights regarding their processing of your data and any options you can apply to your browser to protect your privacy.



13. Google Adwords

We do not include any 3rd party adverts on our website apart from any promotions directly from our suppliers. However, we do use Google Adwords services. If you select any of our advertisements on Google Search, your information may be used in accordance with Google's privacy policy at privacy.google.com/how-ads-work.

14. International Transfer of Personal Data

We may transfer your personal data outside of the United Kingdom (UK) to our EU or non-EU based suppliers when processing your order or requiring communications about you to adequately provide a service.

We will never transfer your personal data to any third parties, inside or outside of the UK, specifically for marketing or commercial purposes.

15. Privacy policies of other websites

Within our website, email and communications, we may include links to third-party websites, including suppliers, partners, on-line card payment and other relevant organisations, that you may choose to visit. Our policy applies only to our website. We cannot control or provide any assurance regarding the content or privacy protection within such websites and recommend you consult their own privacy policies.

16. Changes to our Privacy Policy

Our company keeps its privacy policy under regular review and places any updates on this web page <u>Policy</u>. This Privacy Policy was last updated in May 2021.

17. How to contact us

If you have any questions about Our Company's privacy policy, the data we hold on you, or you would like to exercise one or more of your data protection rights, please do not hesitate to contact us.

Email us at : dpo@djh-consulting.co.uk
Write to us at : DJH Bridgnorth Consulting Ltd

33 The Hobbins The Hobbins Bridgnorth Shropshire WV155HH

18. How to contact the appropriate authority

Should you wish to report a complaint or if you feel that our Company has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office.

Website: https://ico.org.uk Telephone: 0303 123 1113

Write to: Information Commissioner's Office

Wycliffe House

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Water Lane Wilmslow Cheshire SK9 5AF