

## **PRIVACY POLICY**

Eclarity Solutions Ltd ("We") are committed to protecting and respecting your privacy.

This Policy sets out the basis on which we collect personal data from you and that way in which it will be processed by us.

Please read this Policy carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the relevant data protection legislation, the "controller" (or "data controller") is Eclarity Solutions Ltd of Network House, Unit 10G Buntsford Park, Bromsgrove, Worcestershire, B60 3DX. Questions, comments and requests regarding this Policy are welcomed and should be addressed to [dataprotection@eclarity.co.uk](mailto:dataprotection@eclarity.co.uk)

### **We collect different types of information about you for the following reasons:**

- To provide services to you, either at your request or in order to fulfil an existing contract;
- For our legitimate interests, namely in order to help us monitor or improve the services and service levels that we offer, unless any of those legitimate interests are overridden by any of your interests or fundamental rights and freedoms; and
- If we have your permission, to market specific services to you. We shall make sure that it is clear when you are able to give us permission to do this.

### **When do we collect information?**

We collect information on you:

- when you instruct us to provide professional services;
- when you request from us a quotation or other information about us or the services that we provide;
- when you use our website, [www.eclarity.co.uk](http://www.eclarity.co.uk) ("our site"), and through use of cookies; and
- when we speak to you over the phone for the purpose of providing professional services or information to you or answering enquiries from you.

### **Types of personal data we collect**

The minimum information we need from you in order that we can provide services to you is your name (if you are an individual) or full business trading title and contact name (if you are an organisation), address, telephone number and e-mail address. Failure to provide any of the above information may lead to our being unable to provide services to you.

We may use your data in the following ways:

- to provide you with our professional services;
- to manage our professional relationship with you;
- to contact you regarding other services that we think may be of interest to you based on our knowledge of your business and or personal affairs (to the extent that we are lawfully entitled to do so); and
- to send you our newsletter (if we are lawfully entitled to do so).

In order to personalise and improve the quality of our services, when you instruct us to provide personal services we may also ask you about the nature of your business or personal circumstances and how you found us in order that we might gain a clearer understanding of who you are. However, you do not need to provide this information in order for us to provide services to you.

We may need to collect further information in order to provide you with products or services that you have asked for, such as your e-mail address if this has not already been provided to us.

## **Computer Information**

We also collect technical information about you when you visit our site in order to help us monitor or improve the services and service levels that we offer. This information includes the IP address of the computer used to connect to our site, browser type and version, time zone setting, operating system and platform.

We will also collect information about your visit to our site, including the full URL used to access our site, the clickstream to and from our site (including the date and time), information which you have viewed or searched for, page response times, any download errors, how long you have visited certain pages, page interaction information including scrolling, click and mouse overs and any methods used to browse away from our site. This helps to monitor and improve on services and service levels that we offer.

In doing so, we may use your data in the following ways:

- to improve our site so that content is presented in the most effective manner for you and for your computer;
- as part of our efforts to keep our site safe and secure; and
- for troubleshooting, data analysis, testing, research, statistical and survey purposes.

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them please see our Cookie Policy.

Please note that we use Google Analytics, which places "cookies" (text files) on your computer, to help the website analyse how visitors use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing to us other services relating to website activity and internet usage. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of our website. Furthermore you can prevent Google's collection and use of data (ie cookies and IP address) by downloading and installing the browser plug-in available under <https://tools.google.com/dlpage/gaoptout?hl=en-GB>. Please visit: <http://www.google.com/intl/en/policies/privacy/> for further information on how Google uses your data.

If we need to process your personal data for a reason which is not outlined above, we shall contact you in order to obtain your prior consent for such use.

## **Sharing your Personal Data**

We will not share your personal data with any third parties for any purpose without your express consent. We will however, share your personal data with the following parties ("Third Parties"), for the following reasons:

- Other selected third parties, such as sub-suppliers, where it is necessary to do so in order to provide you with the services that you have instructed us to provide;
- Google Analytics, to assist us in the improvement and optimisation of our site.

We reserve the right to disclose or share your personal data in order to comply with any legal obligations, enforce our terms of business, or any other agreement we enter into with you, or to protect the rights, property, or safety of our business and other clients. This disclosure or sharing might include exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Any personal data transferred to countries or territories outside the European Union will only be placed on systems complying with measures giving equivalent protection or personal rights either through international agreements or contracts approved by the European Union.

## **Storage of your Personal Data**

All personal data that you provide to us is stored on our secure servers and systems. We use our best endeavours to ensure that your data is treated securely and in accordance with this Privacy Policy.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict safeguarding procedures and security features to try to prevent any unauthorised access to your personal data.

## **Retention of Personal Data**

How long we store your personal information depends upon the kind of information that we are holding and the purpose for which we need it.

We will keep your personal data for as long as you remain a client of ours, to enable us to contact you, keep a record of your instructions and provide you with our services. We will not keep your personal information for any longer than necessary to fulfil our obligations to you or to meet our legitimate business interests or legal requirements.

Where you have given us your permission to contact you for marketing purposes, including to receive our newsletter, we shall contact you every two years from the date on which you originally gave your permission to ensure that you wish to be contacted in this way.

## **Your Rights**

You have the following rights:

- to request that we provide you with a copy of the personal data that we hold about you ("Access Request");
- to request that we rectify any personal information that we hold about you ("Right to Rectification");
- to request that we erase any personal information we hold about you ("Right to be Forgotten");
- to restrict the level of processing we carry out with your personal data ("Restriction of Processing");
- to obtain from us all personal data that we holding about you in a structured, machine readable form, and have this information transmitted to another organisation ("Data Portability");
- to object to our processing your personal data ("Right to Object"); and
- to withdraw your consent at any time to our processing of your data.

Please see the relevant sections below for further details on your rights as a data subject. You can exercise any of the above rights by emailing us at [dataprotection@eclarity.co.uk](mailto:dataprotection@eclarity.co.uk). You also have the right to lodge a complaint with the Information Commissioners Office if you are unhappy in any way with how we handle your personal information.

We will comply with any request made under this section as soon as possible, and normally within one month from the date of your request. However, if necessary, for example if your request is particularly complex or we receive a number of similar requests, we may extend this period by an additional two months, but we will notify you if we need to do this.

Please note that where we receive requests under this section which are manifestly unfounded or excessive, in particular because of their repetitive character, we may:

- charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or
- refuse to act on the request.

## **Access Request**

You have the right to request a copy of the personal data that we hold about you at any time. Please note that in most circumstances, we will not make a charge for this. However, we may charge a reasonable fee based on administrative costs for any further copies requested.

## **Right to Rectification**

You have the right at any time to ask us to rectify any personal data that we hold about you which is incorrect or incomplete.

If we have disclosed any incorrect or incomplete data to any third parties, we shall inform them of any necessary amendments or corrections made to your personal data under this section.

## **Right to be Forgotten**

You have the right to ask us to erase the personal data that we hold about you in circumstances where:

- it is no longer necessary for us to handle your personal data for the purpose for which it was originally collected;
- you have withdrawn your permission for us to hold your personal data (where we required your permission in order to collect or use it);
- you object to the processing of the data and there is no lawful overriding reason for us to continue processing your personal data;
- the personal data was unlawfully processed; or
- we have to erase your personal data in order to comply with a legal obligation.

## **Restriction of Processing**

You can ask us to restrict how we use your personal data in the following circumstances:

- where you believe that the personal data that we hold about you is inaccurate, you can ask that we refrain from using that data until we can verify the accuracy of it;
- where we have unlawfully processed your personal data, you can ask that we restrict our usage of it rather than erase it completely, or
- where we no longer need to hold your personal data, but you wish us to retain your information for the purpose of establishing, exercising or defending a legal claim.

## **Data Portability**

You have the right to obtain from us all personal data which you have provided to us in a structured, commonly used and machine readable form, provided that such data was processed based on your consent, or for the purpose of a contract between us and the processing was carried out by automated means.

This will allow you to move, copy or transfer personal data easily from one IT environment to another. Alternatively, we can transmit such data directly to another organisation.

Please note that we will not be able to comply with a data portability request if this will affect the rights and freedoms of others.

## **Right to Object**

You have the right to object, on grounds relating your particular situation, to our processing of your personal data where we are doing this for the performance of a task carried out in the public interest (which we will have told you about, if applicable) or where we are carrying out processing for the purpose of legitimate interests pursued by us.

You also have the right at any time to ask us not to process your personal data for direct marketing or profiling purposes (to the extent that such profiling is related to such direct marketing). We will have informed you before the time we obtained your personal data whether we intend to process your personal data for this purpose, or if we intend to disclose your information to any third party for such purposes.

If we process your personal data for automatic decision making or profiling purposes (ie to analyse or predict your personal preferences and purchase behaviour, and such profiling is automated) we will ensure that we tell you about this beforehand and will only do this where this is a necessary condition of entering into a contract between you and us, or where you have given us your explicit consent to do this.

### **Third Party Websites**

Our site may contain links to advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for them. We advise you to check these policies before you submit any personal data to these websites.