

This privacy notice explains the processing of personal data of passive customers of Assurity Consulting Ltd (including the entity of Assurity Consulting Holdings Ltd). Assurity Consulting Ltd is committed to making sure that your privacy is protected.

A passive customer is a person or organisation who Assurity Consulting have worked with previously but have not worked for in the last five years.

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Why do we process your personal data?

Assurity Consulting Ltd collects and processes information about you (personal data) as a passive customer, if you:

- Subscribe to us through our website registrations;
- Contact us via our website, external websites, social media sites or the telephone;
- Engage with us in a tender situation;
- Are referred to us from a current customer or third party;
- Continue to communicate with us e.g. via email, attending events, seminars or webinars etc.; or
- Register for one of our events so we can share your name with the venue for security reasons.

We also collect and process information about you (personal data) as a passive customer, if we:

- Buy in business to business (B2B) data that includes your details (selected on job title within industries that typically purchase our services);
- Meet you at a conference or exhibition;
- Meet you at an industry networking event;
- Want to inform you about relevant events, seminars, webinars or networking opportunities;
- Update you with important information relevant to your business e.g. legislation updates and Assurity Consulting business updates; or
- Receive your registration for one of our events so we can share your name with the venue for security reasons.

What are the principles we apply when processing your personal data?

As a responsible business we apply and are able to demonstrate compliance with the following principles to our control and processing of personal data relating to you as a passive customer:

- Processed lawfully, fairly and in a transparent manner in relation to individuals;
- collect for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- Process in a way that is adequate, relevant and limited to what is necessary;
- Maintain to ensure it is accurate and where necessary kept up to date; every reasonable step will be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed is erased or rectified without delay;
- Keep in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; and
- Process in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

We take reasonable steps to ensure that third parties who process data on our behalf also apply and are able to demonstrate compliance with the above principles. We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect about you and your organisation.

What types of data do we process?

The following list is not exhaustive, but will give you an idea of the kinds of data we may process relating to you. This list will be reviewed regularly as part of the review of this privacy notice to make sure it is as complete as possible:

1. Salutation;
2. First name and surname;
3. Business address;
4. Business email address;
5. Business direct telephone number;
6. Business mobile telephone number;
7. Business telephone number;
8. Gender;
9. Job title;
10. Employment start date;
11. Employment history, the organisations you have worked for previously;
12. Events that we invited you to;
13. Events where we have exhibited and met you;
14. Two way communications we have had with you;
15. Quotations we have presented to you;

16. Reports we have carried out for you;
17. Documents applicable to you;
18. Addresses of the location sites applicable to you;
19. Notes from meetings we have had with you; and
20. Check boxes to reference your preferences on marketing communications – telephone, mail and email (and reason for opt out).

What are the lawful bases for processing the data?

Marketing purposes

As a passive customer by not opting out of our marketing communications, you are allowing us under the basis of legitimate interest to process your data for the purposes sending you up to date email information or calling you about health, safety and environmental topics:

- Educational white papers;
- Up to date industry news;
- Assurity Consulting business and services updates; and
- Invitations to our educational seminars or webinars.

The information we send to passive customer via email is written by experts from an education stand point. For example we send our potential customers emails on a monthly basis and can be opted out of at any time:

- Workplace Compliance News – five current news articles on health, safety or environmental subjects relevant to our customer base.
- Workplace Compliance Alert – one topic based on email and white paper, based on health, safety or environmental information or legislation that our customer base would appreciate being informed about.

If you leave your company your personal information will be deleted from our accessible customer management systems and stored in our secure storage.

When our contractual agreement ends we will not process any customer personal data on Assurity Plus. However, we will hold any reports produced by Assurity Consulting containing customer personal data for 40 years to comply with our personal indemnity insurance. Much of the longer term retention of data will be on the grounds of legitimate interests to defend legal and insurance claims both on behalf of us and our suppliers and customers.

In this case, we will provide you with electronic data exported from Assurity Plus and access for your company to Assurity Plus will be ceased.

Invoicing and order records will be kept for seven years to comply with our legal requirement. This is in line with our Data Protection and Privacy Policy.

How long will we retain your personal data?

To make sure we are managing your information correctly, as a passive customer we will keep your personal data on our EU based CRM system for up to five years from the date of the last communication we had with you, unless your email address hard bounces or you opt-out of receiving our email communications.

If no communication has been made by you within five years of our last communication date your personal data will be deleted.

If you make an enquiry as a passive customer via the telephone or via our website giving us your personal data, we will contact you to discuss your needs, give you more information. Depending on the progression of our working relationship with you as to what we do with your data:

- If we give you a quotation for our services or if you register for one of our seminars or webinars we will record your information on our CRM system which is based in the UK, and we will keep in touch with you via the telephone. We will also keep you up to date via email with information about our industry and our business and services, educational health, safety and environmental topics, unless you opted out when you gave us your details. You can opt out of our email communications at any time using the link at the bottom of our emails. If we send you an email and your corporate email address hard bounces back to us, we will delete your personal information from our system or;
- If you make an enquiry, subscribe to us through our website and there is no suitability for a working partnership, we will delete all of your information.

We will keep relevant data throughout the duration of our working relationship with you. You have a duty to inform us of changes, such as changes to your address or other contact details, and we will ensure that we keep your records up to date based on the updates you have provided. You can update us via info@assurityconsulting.co.uk or inform us that you no longer wish to receive emails or telephone calls from us.

NB. Where there is an outstanding dispute, court proceedings, legal claim, insurance claim, or similar we will extend the retention periods stated below of data relevant to the case until the case is closed and the window of opportunity to appeal any decision is considered to be closed.

Who is the data controller and who processes your data?

Assurity Consulting Limited is the data controller. We have our own in house marketing team and CRM system so we process much of the required personal data for the purposes of marketing our information to you. However, there are some EU based third parties that we may need to send your data to and from, or may view your data for processing.

These include but are not limited to a:

- Marketing agency;
- Website agency;
- Direct marketing consultancy;
- Search engine optimisation consultancy;
- Mass email marketing company;
- Online survey company;
- Webinar hosting company; and
- Venue where we host our events.

It may sometimes be necessary to transfer your personal information overseas. When this is needed information is normally only shared within the European Economic Area (EEA). Our main data servers are located in the UK and maintained by a UK based data storage company. Data may be transferred outside of the EEA by the data storage company as part of their support provision to ensure continuity of service. We have a contract in place with the data storage company to ensure that the highest data security standards are maintained. Any transfers made will be in full compliance with all aspects of the data protection act.

What are your rights as a data subject?

If you would like to realise any of these rights please contact us using the contact details provided in the how to contact us section of this document. Please make it clear what right you want to realise and be as specific as possible with what you want so that we can prioritise your request.

Right to be informed – you have the right to be informed about how and why we process your personal data. This privacy notice is designed to meet this requirement.

Right of access – you have the right to access your personal data that we hold on you. If you make a request, please try and be as specific as possible about the type of data you would like to have access to and the time frames you would like us to look at. We may contact you to discuss your request to help to meet your needs.

Right to rectification – you have the right to request that we rectify your personal data. We also want to make sure that your personal data is accurate and up to date. Please let us know if there is data about you that you believe is incorrect and needs to be rectified.

Right to erasure (to be forgotten) – you have the right to request the deletion or removal of personal data. We believe that we have set out clearly the data we hold, the legal bases for processing the data and a realistic retention period which balances the rights of you as an individual against the interests of us and third parties. However, if you believe that we hold data on you that should be deleted, please let us know, so that we can investigate.

Right to restrict processing – you have the right to request that we ‘block’ or suppress processing of data (including deletion of data). If you wish to exercise this right please let us know the reasons for this.

Right to object – you have a right to object to our processing of your personal data. If you wish to exercise this right, please give clear details on the grounds of your objection.

Right to data portability – we do not believe that we hold data on our passive customers that falls into the definition of this right within the GDPR regulations. However, if you believe we are incorrect please let us know why and what data you believe we should enable for portability.

Rights related to automated decision making including profiling – you have a right to be informed that profiling or automatic decision making will be performed, the right of access to things like the logic involved in automatic decision making, the right not to be subject to a decision based solely on automated decision making. If we wish to profile your data or automate decisions based on your data, we will let you know as soon as possible.

Right to lodge a complaint with a supervisory authority – you have the right to raise a complaint with the supervisory authority in the country where you live, where you work, or where the infringement took place. In the UK the supervisory authority is the ICO (ico.org.uk).

Changes to this privacy notice

We regularly review our privacy notices. The most up to date privacy notices are available on our website. The date of issue of this privacy notice is indicated in the footer of the document.

How to contact us?

Please contact us if you have any questions about this privacy notice or the personal data we hold about you:

Email: dataprotection@assurityconsulting.co.uk

Mail: Data Protection Compliance Coordinator
Assurity Consulting Ltd
26 Redkilyn Way
Horsham
West Sussex
RH13 5QH