

# Privacy Policy

(Last updated: 26 April 2021)

We take your privacy very seriously. Please read this Privacy Policy carefully as it contains important information on 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.

In this notice “Data Protection Legislation” means the Data Protection Act 2018 (as amended by the Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019 which merge the previous requirements of the Data Protection Act with the requirements of the General Data Protection Regulation ((EU) 2016/679)) and any other laws and regulations in the UK applicable to the processing of personal data.

For the purpose of the Data Protection Legislation and this notice, we are the ‘data controller’. This means that we are responsible for deciding how we hold and use personal data about you. We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice.

## Key terms

For the purposes of this Privacy Policy:

- **We, us, our:** Sladen Consulting Ltd
- **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, sexual orientation, etc

## Collecting and Using Your Personal Data

### Personal data we collect about you

The table below sets out the personal data we will or may collect while providing our services:

Personal data we will collect	Personal data we may collect
Your name, job title, business address, business email address and telephone number(s)	Your bank details
Information about your use of our website	Details of your professional online presence e.g., LinkedIn profile

## 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
- from a third party with your consent e.g., social media including LinkedIn and YouTube
- via our information technology systems, e.g.
  - [www.sladenconsulting.com](http://www.sladenconsulting.com) website
  - automated monitoring of our website and other technical systems, such as our computer networks or email

## 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.

- for the performance of our agreement with you or to take steps at your request before entering into an agreement
- for our legitimate interests or those of a third party, or
- 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
Ensuring business policies are adhered to e.g. policies covering internet use	For our legitimate interests or those of a third party
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party To comply with our legal 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
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party To comply with our legal obligations

Updating and enhancing client records	For the performance of our agreement with you or to take steps at your request before entering into an agreement  For our legitimate interests or those of a third party
Marketing our services: - existing and former clients - third parties who have previously expressed an interest in our services	For our legitimate interests or those of a third party

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 information about our services, including new services/products (by email, text message, telephone, or post).
- 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 outside Sladen Consulting for marketing purposes.
- You have the right to opt out of receiving promotional communications at any time by contacting us at [anna@sladenconsulting.com](mailto:anna@sladenconsulting.com) or write to The Data Protection Officer, Sladen Consulting Limited, Sladen, Jaggars Lane, Hathersage, Hope Valley, Derbyshire S32 1AZ United Kingdom.
- We may ask you to confirm or update your marketing preferences if you request us to provide further services in the future, or if there are changes in the law or regulations.

## Who we share your personal data with:

- We routinely share personal data with:
  - Consultants, Associates and Designers who we appoint to deliver services to you
  - Other third parties where necessary depending on your requirements
  - Insurers and professional advisers e.g., accountants
  - External service suppliers that we use to make our business more efficient, including:
    - Wilkeswood – website developer
    - Goldvision - CRM system
    - Google Analytics – digital marketing analysis software
- We only allow our service providers to handle your personal data if we are satisfied that they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.
- We will not share your personal data with any additional third party without your prior and specific consent.

## Where your personal data is held

- Information may be held at our offices and those of our service providers (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 working with you. We will do so for one of these reasons:
  - to respond to any questions
  - 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.
- When it is no longer necessary to retain your personal data, we will delete or anonymise it, where possible.

## 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 services we are providing to you. These transfers are subject to special rules under European and UK data protection law
- 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 (the right of access)
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: 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 us - see below: **‘How to contact us’**; and

- let us have enough information to identify you
- 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.

## How to complain

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

The General Data Protection Regulation also gives you the 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>.

## How to contact us

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

The Data Protection Officer, Sladen Consulting Limited, Sladen, Jaggars Lane, Hathersage, Hope Valley, Derbyshire S32 1AZ United Kingdom