

### **CUSTOMER PRIVACY NOTICE**

Emery Support Services Limited are committed to protecting your privacy and ensuring that your personal information is collected and used appropriately, lawfully and transparently.

This Privacy Notice explains:

- Who we are
- What personal information we collect
- How we use your personal information
- Who we share your information with and why
- How we keep your information secure
- Your rights
- How to contact us

## **WHO WE ARE**

Emery Support Services Limited provides governance and related support services through appropriately qualified and/or experienced consultants based in the UK.

Emery Support Services Limited determines the purposes and means of processing personal client data relating to providing its support services. This means we are the data controllers for these core services and therefore responsible for managing this client data and ensuring compliance.

# WHAT PERSONAL INFORMATION WE COLLECT

Personal information includes your name, address, or phone number and other information that is not otherwise publicly available. We collect personal information about you when you contact us about our support services, meet with a consultant or visit our website.

The type of personal information we collect will depend on the purpose for which it is collected and includes:

Contact details

We collect personal information directly from you. For example, we ask for personal contact information at the start of our relationship to ensure we can communicate and follow-up effectively with you.

### SPECIAL CATEGORY INFORMATION

In some instances, it is necessary to collect more sensitive information (such as gender, age, faith, ethnic group and sexual orientation information) which is called special category data. This is to allow us to provide our Board Evaluation and/or Skills Audit services to you. We will always obtain your consent during the advice process to gather this data and explain what information we require and why it is needed. Sensitive personal information will always be processed and stored securely. You can withdraw

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your consent at any time to us processing this data, however, this may mean that you can no longer access the service the information was gathered for.

### **COOKIES**

We also collect information about you from other sources. For example, our website automatically collects information from your computer using "cookies" which provides us with limited personal information. Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the website owners. For further information visit <a href="www.aboutcookies.org">www.aboutcookies.org</a> or <a href="www.aboutcookies.org">www.aboutcookies.org</a>.

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.

#### **DATA RETENTION**

We keep your personal information only as long as is necessary for the purpose for which it was collected and to meet regulatory or legislative requirements. Personal information will be securely disposed of normally within twelve months of completion or when it is no longer required whichever is sooner.

#### ON WHAT BASIS DO WE COLLECT DATA

The processing of your personal data is allowed on a lawful basis for several reasons. The data required for the provision of services is processed on the basis there is a contract with you to do so.

### HOW WE USE YOUR PERSONAL INFORMATION

We process your information in order to support and maintain our contractual relationship with you and to comply with legal and regulatory requirements. This includes providing our services to you and any related activities required or requested.

We also process your data for specific business purposes to enable us to give you the best support services and the best and most secure experience. Our business purposes include the following:

- Enhancing, modifying, and personalising our services for the benefit of our customers
- Providing communications which we think will be of interest to you
- Customer satisfaction research or statistical analysis
- Audit and record keeping purposes
- Enhancing the security of our network and information systems.

You have the right to object to this processing if you wish, please see "YOUR RIGHTS" section below. Please bear in mind that if you object this may affect our ability to carry out the tasks above for your benefit.

# WHO WE SHARE YOUR INFORMATION WITH AND WHY

We share your information with external third parties who perform tasks for us and help us to provide the services you require these include:

Associates of Emery Support Services Limited;

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- Other organisations, including regulatory bodies, the police and fraud prevention agencies, to prevent and detect fraud;
- Third parties where required by law, court order or regulation; and/or as part of an acquisition or sale.

### HOW WE KEEP YOUR INFORMATION SECURE

We are committed to ensuring the confidentiality of the personal information that we hold and we continue to review our security controls and related policies and procedures to ensure that your personal information remains secure.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information is kept secure.

If we work with third parties in countries outside the EU we ensure these are countries that the European Commission has confirmed have an adequate level of protection for personal information, or the organization receiving the personal data has provided adequate safeguards.

In limited circumstances data may be accessed outside of the EEA ie by employees when they travel. In these circumstances we ensure there are appropriate information security measures in place to safeguard your information.

## **YOUR RIGHTS**

Emery Support Services Limited tries to be as open as it can be in terms of giving people access to their personal information and therefore have outlined your rights below. This privacy notice was drafted with brevity and clarity in mind, therefore further information can be gathered by contacting us using the details below, or more information about your data protection rights can be found here: <a href="https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/">https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/</a>

### **INDIVIDUAL DATA RIGHTS AND REQUESTS**

- the purposes of the processing;
- The right to be informed You can request that we provide 'fair processing information', typically through this privacy notice;
- The right of access You may request a copy of the personal information we hold about you using the contact details found on the end of this policy;
- The right to rectification The accuracy of your personal information is important to us. You have the right to ask us to update or correct your personal information;
- The right to erasure You may request the deletion or removal of personal data where there is no compelling reason for its continued processing;
- The right to object You may object to the processing of your data based on legitimate interests;
- The right to restrict processing You have a right to request we 'block' or suppress processing of your personal data;
- The right to data portability You may request to obtain and reuse your data; and
- The right not to be subject to automated decision-making including profiling.

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If you wish to correct, restrict, delete or make changes to your personal information, or any of the data subject rights listed above, Please contact us using the information shown below.

# **HOW TO CONTACT US**

If you have questions about this notice, need further information about our privacy practices, or wish to give or withdraw consent, exercise preferences or correct your personal information, please contact us via the website: <a href="https://www.emerysupportservices.co.uk/contact-us/">https://www.emerysupportservices.co.uk/contact-us/</a> or email: Bob@emerysupportservices.co.uk

## **HOW TO COMPLAIN**

If you wish to raise a complaint about how we have handled your personal data, you can contact The Office of Data Protection who will investigate the matter.

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law you can complain to our regulator:

Information Governance Department Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

0303 123 1113

# www.ico.org.uk/concerns

# **CONSENT TO GATHER SPECIAL CATEGORY DATA**

As detailed above, in some instances, it is necessary for us to collect more sensitive information (such as gender, age, faith, ethnic group and sexual orientation information) which is called special category data. This is to allow us to provide our specialist support services to you. This is where we need to gather your consent to the collection and processing of this data. You can withdraw your consent at any time to us processing this data, however, this may mean that you can no longer access the service the information was gathered for.

	Data	By ticking this box you are giving consent for special category
		personal data to be collected stored in order for your
		consultant to provide you with a tailored support service(s).

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