

# CRB ASSOCIATES

## **Privacy and data protection notice**

*November 2018*

Personal data is the term used for information which can be used to identify an individual. As a client or potential client of CRB Associates Ltd ("We"; "Us"; "Our"), We will hold certain information about your organisation ("You"; "Your"), which will usually contain personal data relating to one or more of Your employees or directors. For the purposes of clarity, we will refer to this information as 'Your personal data'. We are the Data Controller for this information, and this privacy and data protection notice sets out how we will collect, store and use this information.

If You are an existing client of Ours, we will usually also hold personal data (including special category data) of Your clients or subscribers as part of Our service provision to You. We are the Data Processor for this information, and You are the Data Controller. The way in which we store and process this information is agreed with You individually as part of Our contract with You.

### **The types of personal data we collect and use**

The information we collect in order to conduct business with You is largely organisational. The only personal information we would usually store is the name and contact details of Your staff member(s) with whom we liaise in the normal course of business.

We will not collect or store any special category data about You (for the definition of special category data please search the ICO website at <https://ico.org.uk/>).

### **Using Your personal data: the legal basis and purposes**

We'll process Your personal data:

- 1) As necessary to perform Our contract with you:
  - To carry out Our own due diligence and to take steps at Your request before entering into a contract;
  - To manage and carry out Our obligations under a contract;
  - To keep Our records up-to-date.
- 2) As necessary for our own legitimate interests:
  - For good governance, accounting, and managing and auditing Our business operations;
  - To communicate with You regarding potential business arrangements in which You have expressed an interest and have not asked us to refrain from contacting You.
- 3) As necessary to comply with a legal obligation:
  - When You or a member of Your staff make requests within Your rights under data protection law;
  - For compliance with legal or regulatory requirements and related disclosures;
  - For establishment and defence of legal rights.
- 4) Based on Your consent, e.g.:
  - To retain Your details for an extended period where We have obtained Your consent to do so;
  - To send you marketing communications where We have obtained Your consent to do so.

Where You have provided consent for the above activities, You are at liberty to change your mind and withdraw Your consent at any time.

## **Sharing of Your personal data**

Subject to applicable data protection law, we may share Your personal data with:

- Subcontractors and other persons who help Us provide Our products and services;
- Companies and other persons providing services to Us;
- Our legal and other professional advisors;
- Government bodies and agencies in the UK;
- Courts, to comply with legal requirements;
- To the relevant companies or persons in the event of a restructure or sale of Our business or its assets;
- Any other organisation where we have Your consent or where it is required by law.

## **Security and retention of Your personal data**

In order to ensure that Your personal data and other commercially sensitive information is kept safe, We adhere to an internal security policy in line with industry best practice. As part of this policy, all of the information We hold electronically is stored on encrypted disks (known as 'encryption of data at rest'). We also use encryption when transferring Your data electronically.

If You provide us with your personal information as part of an enquiry about our products or services, this information will be held on the legal basis of contractual performance, for a maximum period of two years, unless You give your consent for us to hold the information for longer, or unless We subsequently enter into a business relationship with Your organisation, in which case the data will be held for as long as the contract requires.

For past clients, we will retain Your personal data for as long as necessary in order to carry out our legitimate business interests, which may include referring back to previous business engagements.

## **Your rights under applicable data protection law**

Your rights are as follows (noting that these rights don't apply in all circumstances):

- The right to be informed about Our processing of Your personal data;
- The right to have Your personal data corrected if it's inaccurate, and to have incomplete personal data completed;
- The right to object to processing of Your personal data;
- The right to restrict processing of Your personal data;
- The right to have Your personal data erased;
- The right to request access to Your personal data (known as a Subject Access Request) and information about how We process it;
- The right to move, copy or transfer Your personal data;
- Rights in relation to automated decision making (please note that We do not engage in this practice).

To enquire about or to exercise any of the above rights in relation to the personal data that We hold about You, please contact either Your Account Manager (if appropriate) or the Managing Director at CRB Associates Ltd, The Priory, High Street, Redbourn, Hertfordshire AL3 7LZ.

## **Our handling of Subject Access Requests**

If You have not previously made a Subject Access Request (SAR), We will comply with your SAR within one month of receiving it, at no cost to You.

If You make subsequent SARs, and the data we hold about You has not changed substantially since your initial request, We may lawfully decline to provide the information to You again. Alternatively We may charge You a fee for complying with subsequent SARs.

### **Your right to complain**

If you have any queries regarding Our handling of Your data or any aspect of the above notice, you can contact the Managing Director at CRB Associates Ltd, The Priory, High Street, Redbourn, Hertfordshire AL3 7LZ.

If you are not happy with our response, You have the right to complain to the Information Commissioner's Office. It has enforcement powers and can investigate compliance with data protection law. Their website is at <https://ico.org.uk/>.