PRIVACY POLICY

BACKGROUND:

Economics for the Environment Consultancy Ltd ("eftec") understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, www.eftec.co.uk ("Our Site") and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

"personal data"	means any and all data that relates to an identifiable person
	who can be directly or indirectly identified from that data. In
	this case, it means personal data that you give to Us via Our
	Site. This definition shall, where applicable, incorporate the
	definitions provided in the EU Regulation 2016/679 – the
	General Data Protection Regulation ("GDPR"); and

"We/Us/Our"

means Economics for the Environment Consultancy Ltd, a limited company registered in England under company number 02917907, whose registered and main trading address is 3^{rd} Floor, 4 City Road, London, EC1Y 2AA, United Kingdom.

2. Information About Us

- 2.1 Our Site is owned and operated by Economics for the Environment Consultancy Ltd, a limited company registered in England under company number 02917907, whose registered address and main trading address is 3rd Floor, 4 City Road, London, EC1Y 2AA, United Kingdom.
- **2.2** Our VAT number is GB 564 4215 47
- 2.3 Our Data Protection contact is Siegi Arndt, and can be contacted by email at eftec@eftec.co.uk, by telephone on +44 207 580 5383, or by post at 4 City Road, London, EC1Y 2AA.

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

4. Your Rights

4.1 As a data subject, you have the following rights under the GDPR, which this Policy and

Our use of personal data have been designed to uphold:

- 4.1.1 The right to be informed about Our collection and use of personal data;
- 4.1.2 The right of access to the personal data We hold about you (see section 12);
- 4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 13);
- 4.1.4 The right to be forgotten i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 13);
- 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
- 4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- 4.1.7 The right to object to Us using your personal data for particular purposes; and
- 4.1.8 Rights with respect to automated decision making and profiling.
- 4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 13 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.
- 4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

5. What Data Do We Collect?

Depending upon your use of Our Site, We may collect some or all of the following personal and non-personal data set out below. For example, if you send Us an email or sign up to our e-newsletter, We may collect your name, your email address, and any other information which you choose to give Us.

- **5.1** name;
- 5.2 gender;
- **5.3** business/company name
- 5.4 job title;
- 5.5 contact information such as email addresses and telephone numbers;
- 5.6 IP address We may use a web analytics service to track and report on general website traffic using ip addresses.

6. How Do We Use Your Data?

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.
- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to

Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:

- 6.2.1 Replying to emails from you;
- 6.2.2 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by clicking on the unsubscribe link);
 - If you give us your business card with your contact details, we may collect this data
- 6.3 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- 6.4 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):
 - 6.4.1 Mailing lists are maintained on a web-based email service, allowing users to update their details or unsubscribe via links provided on emails. Data is therefore 'self-cleaning;
 - 6.4.2 Any newsletter opt-ins received by email are deleted as soon as they are transferred to the database.

7. How and Where Do We Store Your Data?

- 7.1 We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it
- 7.2 Some or all of your data may be stored outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). You are deemed to accept and agree to this by using Our Site and submitting information to Us. If We do store data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.
- 7.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.

8. Do We Share Your Data?

- 8.1 Subject to section 8.2, We will not share any of your data with any third parties for any purposes.
- 8.2 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority.
- 8.3 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

8.4 We may sometimes use third party data processors that are located outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Where We transfer any personal data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR

9. What Happens If Our Business Changes Hands?

- 9.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.
- 9.2 In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes

10. How Can You Control Your Data?

- 10.1 In addition to your rights under the GDPR, set out in section 4, when you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details).
- 10.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

11. Your Right to Withhold Information

When you visit our website, the only data we will collect from you is your contact details only if you sign up to our newsletter. We may track general website traffic using ip addresses.

12. How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details at eftec@eftec.co.uk, or using the contact details below in section 13.

13. Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at eftec@eftec.co.uk, by telephone on +44 207 580 5383, or by post at 3rd Floor, 4 City Road, London, EC1Y 2AA. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12, above).

14. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.