

## **[COMPANY NAME] PRIVACY POLICY**

[COMPANY NAME] ("we") are committed to protecting and respecting your privacy. This Privacy Policy [together with our Terms of Use,] explains how we treat any personal data we collect and process when you use our website, services or products.

### **1. Collection and processing of your personal data**

We only collect and process your personal data if:

- You have agreed to it; or
- It is necessary in order for us to be able to provide our service or product, which you have agreed to; or
- It is necessary for compliance with our legal obligations as providers of [TYPE OF SERVICES OR PRODUCTS]; or
- Under specific circumstances, if it is necessary to protect your life and vital interests; or
- We have legitimate reason to do so, such as for fraud prevention or debt collection.

### **2. What types of personal data we handle**

We collect and process the personal data that you provide when interacting with us, either online or via email, phone or post.

Such personal data may include the following:

- First name and surname;
- Postal and/or email address;
- Gender, date of birth;
- Country of residence and/or nationality;
- Unique identifier information (e.g. your customer username or number and password);
- Financial information (e.g. payment card or bank account information);
- Health information, where it is relevant to the service we provide;
- Some details provided by your device such as IP address, device ID, device type, and location data.

### **3. How we use your personal data**

We may use the personal data we collect and process about you in order to:

- Provide you with access to our website;
- Provide the services or products you request;
- Process any payment required for the products and services you have requested;
- Provide you with information you have requested, including without limitation, quotations, service documentation, brochures, newsletters and responses to applications;
- Respond to any enquiries from you regarding our products and services;
- Where you have agreed, provide you with information about certain other goods and services which we believe may be of interest to you;
- Meet our legal and regulatory obligations;
- Detect and prevent fraud.

### **4. Personal data sharing and transferring**

We will not share your personal data with anyone else unless you agree to this, or such sharing is necessary to fulfil our contract with you, or we are legally allowed or required to do so. Moreover, your personal data will only be shared with selected organisations which comply with our security procedures and policies.

Organisations we may share your personal data with include:

- Another member of our group of companies where they help provide our services to you;
- Our service providers and subcontractors, where they us help provide our services to you;
- To a regulating body or other authority where we need to comply with a regulatory or legal obligation;
- Fraud prevention or debt collection organisations when required to protect our legitimate interests.

Some of those organisations may be based in a country outside the European Economic Area or where different data privacy laws apply. We will only transfer your personal data to that country if they ensure an adequate level of protection of your rights and freedoms, or you have given us your consent, or that organisation is contractually bound to meet European Economic Area data protection law.

We will not sell your personal data to anyone.

## **5. Personal data protection and storage**

Personal data collected and processed in accordance with this Privacy Policy is stored on secure servers located in [JURISDICTION OF SERVER LOCATION].

We handle your personal data in accordance with adequate and reasonable procedures and technologies in order to maintain and protect its security, availability, confidentiality and integrity, and prevent its unlawful or unauthorised processing, accidental loss or damage, from its collection until its destruction.

Where personal data is transmitted across the internet, it will be encrypted.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of your personal data, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## **6. Personal data disposal and retention**

We will only keep your personal data for as long as it is needed for the purposes for which it was collected and we will remove from our systems all personal data which is no longer required.

We will only retain your personal data after this time where we are required to do so, in order to meet a regulatory or legal obligation.

## **7. Use of cookies**

We use cookies on our website in order to improve your user experience by enabling our website to 'remember' you, either for the duration of your visit (using a 'session cookie') or for repeat visits (using a 'persistent cookie'). We may also use cookies to enable us to target our services or products based, for example, on your location and/or browsing habits.

Please [click here](#) to read our Cookie Policy which explains what we do and how you can alter your cookie settings.

## **8. Your rights**

You have the right at any time and free of charge to access your personal data in the following ways:

- Request a copy of the personal data we hold about you. We may charge a reasonable fee to provide further copies, and can refuse to give you this information if your requests are clearly unjustified or excessive;
- Have your personal data corrected if it is inaccurate or incomplete;
- Request the deletion of your personal data where it is no longer necessary for us to keep it for the purpose for which it was originally collected or processed, unless we have a legal or regulatory obligation to retain the personal data;

- Restrict further processing of your personal data. Where you have previously entered into a contracted service or product with us, this may imply cancelling the contracted service or product;
- Withdraw your agreement to direct marketing, including profiling;
- Obtain and reuse your personal data for your own purposes subject to certain conditions of portability.

#### **9. How to contact us**

For the purposes of data protection legislation, [COMPANY NAME/NAMES is/are] the data controller.

To exercise any of your rights, or if you have any questions about our Privacy Policy, or if you wish to make a complaint about the use of your personal data, please contact our Data Protection Officer, the details of which are below:

Data Protection Officer

[COMPANY NAME]

[POSTAL ADDRESS]

[Data.Protection@CollinsonGroup.com](mailto:Data.Protection@CollinsonGroup.com)

If you are unsatisfied with our response, you can contact the Information Commissioner's Office (ICO). Further information can be found at <https://ico.org.uk/>.

#### **10. Other websites**

Our website may contain links to other websites. This Privacy Policy only applies to our website, services and products so when you link to other websites, you should read their own privacy policies.

#### **11. Changes to our policy**

We keep our Privacy Policy under regular review and we will make any new versions available on our website. This Privacy Policy was last updated on [DATE OF ISSUE].