

WEBSITE PRIVACY POLICY

I am **CG Pro-Active HR Ltd**, a company registered in England and Wales with company number 11244910, whose registered address is at Parkfield Crescent, Tamworth, B77 1HB. In this privacy policy I will refer to the company as 'I', 'me', 'my' or 'mine'.

You can get hold of me in any of the following ways:

- (a) by phoning me on 0796 250 769;
- (b) by e-mailing me at info@cgproactivehr.co.uk; or
- (c) by writing to me at the above registered address.

I take the privacy, including the security, of personal information I hold about you seriously. This privacy policy is designed to inform you about how I collect personal information about you and how I use that personal information. You should read this privacy policy carefully so that you know and can understand why and how I use the personal information I collect and hold about you.

The company does not have a specific Data Protection Officer, but if you have any questions about this privacy policy or issues arising from it then you should contact Catherine Glover, Director, who is responsible for matters relating to data protection at our organisation, including any matters in this privacy policy. You can contact them using the details set out above.

This Privacy Policy may be updated from time to time. This version was last updated in January 2023.

1. Key Definitions

The key terms used throughout this privacy policy are defined below, for ease:

Data Controller: under UK data protection law, this is the organisation or person responsible for deciding how personal information is collected and stored and how it is used.

Data Processor: a Data Controller may appoint another organisation or person to carry out certain tasks in relation to the personal information on behalf of, and on the written instructions of, the Data Controller. (This might be the hosting of a site containing personal data, for example, or providing an email marketing service that facilitates mass distribution of marketing material to a Data Controller's customer-base.)

Personal Information: in this privacy policy I refer to your personal data as 'personal information'. 'Personal information' means any information from which a living individual can be identified. It does not apply to information which has been anonymised.

Special Information – certain very sensitive personal information requires extra protection under data protection law. Sensitive data includes information relating to health, protected characteristics and also includes genetic information and biometric information.

2. Details of personal information which I collect and hold about you

2.1 Set out below are the general data categories and, in each case, the types of personal information which I collect, use and hold about you:

Data Category	Types of personal information in that category
Identity Information	This is information relating to your identity such as your name (including any previous names), gender, preferred pronouns, marital status and date of birth
Contact Information	This is information relating to your contact details such as e-mail address, addresses, telephone numbers
Account Information	This is information relating to your account with me
Payment Information	This is information relating to the methods by which you provide payment to me such as bank account details and details of any payments (including amounts and dates) which are made between us.
Transaction Information	This is information relating to transactions between us such as details of the goods, services and/or digital content provided to you and any returns details.
Survey Information	This is information which I have collected from you or which you have provided to me in respect of surveys and feedback.
Marketing Information	This is information relating to your marketing and communications preferences.
Website, Device and Technical Information	This is information about your use of our website and technical data which I collect (including your IP address, the type of browser you are using and the version, the operating system you are using, details about the time zone and location settings on the device and other information I receive about your device)

2.2 The types of personal data I collect about you may differ from person to person, depending on who you are and the relationship between us.

3. Details of special information which I collect and hold about you

3.1 Special information is defined in section 1 above.

3.2 I do not currently collect or hold any special information about you.

4. Details of how and why your personal information is used

4.1 I am only able to use your personal information for certain legal reasons set out in data protection law. There are legal reasons under data protection law other than those listed below but, in most cases, I will use your personal information for the following legal reasons:

- (a) **Contract Reason:** this is in order to perform my obligations to you under a contract we have entered into;
- (b) **Legitimate Interests Reason:** this is where the use of your personal information is necessary for my (or a third party's) legitimate interests, so long as that legitimate interest does not override your fundamental rights, freedoms or interests.
- (c) **Legal Obligation Reason:** this is where I have to use your personal information in order to perform a legal obligation by which I am bound; and
- (d) **Consent Reason:** this is where you have given me your consent to use your personal information for a specific reason or specific reasons.

4.2 So that I am able to provide you with services, I will need your personal information. If you do not provide me with the necessary personal information, I may be prevented from supplying the services to you.

4.3 It is important that you keep your personal information up to date. If any of your personal information changes, please contact me as soon as possible to let me know. If you do not do this then I may be prevented from supplying the services to you.

4.4 Where I rely on consent for a specific purpose as the legal reason for processing your personal information, you have the right under data protection law to withdraw your consent at any time. If you do wish to withdraw your consent, please contact me using the details set out at the beginning of this policy. If I receive a request from you withdrawing your consent to a specific purpose, I will stop processing your personal information for that purpose, unless I have another legal reason for processing your personal information, in which case, I will confirm that reason to you.

4.5 I list below the different purposes for which I use your personal information and, in each case, the legal reason(s) allowing me to use your personal information. Please also note the following:

- (a) if I use the Legitimate Interests Reason as the legal reason for which I can use your personal information, I will also explain to you what that legitimate interest is; and
- (b) for some of the purposes I may have listed more than one legal reason on which I can use your personal information, because the legal reason may be different in different circumstances. If you need confirmation of the specific legal reason that I am relying on to use your personal data for that purpose, please contact me using the contact details set out at the start of this privacy policy.

Purpose	Legal Reason(s) for using the personal information
To register you as a customer	Contract Reason Legitimate Interests Reason (in order to recommend to you other goods, services and/or digital content which helps us to develop your business)
To process your order, which includes taking payment from you, advising you of any updates in relation to your order or any enforcement action against you to recover payment.	Contract Reason Legitimate Interests Reason (in order to recover any outstanding payments owed)
To manage our contract with you and to notify you of any changes	Contract Reason
For record keeping, (including in relation to any indemnity cover and my own business records)	Contract Reason Legal Obligation Reason
To improve the goods, services, and/or digital content which I supply	Legitimate Interests Reason (in order to improve the goods, services, and/or digital content for future customers and to grow our business)
To recommend and send communications to you about goods, services, and/or digital content that you may be interested in.	Legitimate Interests Reason (in order to grow our business) Consent Reason
To ensure the smooth running and correct operation of our website	Legitimate Interests Reason (to ensure our website runs correctly)
To understand how customers and visitors to our website use the website and interact with it via data analysis	Legitimate Interests Reason (to improve and grow our business, including our website, and to understand our customer's needs, desires and requirements)

4.6 Sometimes I may anonymise personal information so that you can no longer be identified from it and use this for my own purposes. In addition, sometimes I may use some of your personal information together with other people's personal information to give me statistical information for my own purposes. Because this is grouped together with other personal information and you are not identifiable from that combined data I am able to use this.

4.7 Under data protection laws I can only use your personal information for the purposes I have told you about, unless I consider that the new purpose is compatible with the purpose(s) which I told you about. If I want to use your personal information for a different purpose which I do not think is compatible with the purpose(s) which I told

you about then I will contact you to explain this and what legal reason is in place to allow me to do this.

5. Details of how your personal information may be collected

5.1 Your personal information will usually be collected directly from you when you contact me by email, telephone, in writing or otherwise, when you contract to buy my services and/or when you fill out my website forms. This includes the personal information which you provide to me when you subscribe to my newsletters.

5.2 I may receive some of your personal information from third parties or publicly available sources. This includes:

- (a) Identity Information and Contact Information from online sources such as LinkedIn;
- (b) Identity Information and Contact Information from publicly available sources such as Companies House;
- (c) Website, Device and Technical Information from third parties such as analytics providers such as Google, Office.

5.3 I may also receive Website, Device and Technical Information automatically from technologies such as cookies which are installed on my website.

6. Details about who your personal information may be shared with

6.1 I may need to share your personal information with other organisations or people. These organisations include:

- (a) Other companies with whom I may partner and/or sub-contract and who may might act as joint data controllers or as data processors on my behalf in the delivery of my services.
- (b) Third parties who are not part of our group. These may include:
 - (i) Suppliers: such as IT support services, payment providers, administration providers, all of whom are based in the UK;
 - (ii) Government bodies and regulatory bodies: such as HMRC, fraud prevention agencies, etc who are based in the UK;
 - (iii) Our advisors: such as lawyers, accountants, insurance companies and bankers, all of whom are based in the UK;
 - (iv) Website, newsletter and e-mail platforms, who are based in the UK and US.
- (c) any organisations which propose to purchase our business and assets in which case I may disclose your personal information to the potential purchaser.

6.2 Depending on the circumstances, the organisations or people who I may share your personal information with will be acting as either Data Processors or Data Controllers. Where I share your personal information with a Data Processor I will ensure that we have in place contracts, which set out the responsibilities and obligations of both parties, including in respect of security of personal information.

6.3 I do not sell or trade any of the personal information which you have provided to me.

7. **Details about how long your personal information will be held**

7.1 I will only hold your personal data for as long as is necessary. How long is necessary will depend upon the purposes for which your personal information was collected (see section 4 above) and whether there is any legal obligation to keep the personal information (such as in relation to accounting or auditing records or for tax reasons).

7.2 I may also need to keep personal information in case of any legal claims, including in relation to any guarantees or warranties which are provided with my services.

8. **Your rights under Data Protection Law**

8.1 Under data protection laws you have certain rights in relation to your personal information, as follows:

- (a) **Right to request access:** (otherwise known as 'subject access'). This is the right to obtain from me a copy of the personal information which I hold about you. I must also provide you with certain other information in response to these requests to help you understand how your personal information is being used.
- (b) **Right to correction:** this is the right to request that any incorrect personal data is corrected and that any incomplete personal data is completed.
- (c) **Right to erasure:** this right only applies in certain circumstances. Where it does apply, you have the right to request me to erase all of your personal information.
- (d) **Right to restrict processing:** this right only applies in certain circumstances. Where it does apply, you have the right to request me to restrict the processing of your personal information.
- (e) **Right to data portability:** this right allows you to request me to transfer your personal information to someone else.
- (f) **Right to object:** you have the right to object to me processing your personal information for direct marketing purposes. You also have the right to object to me processing personal information where our legal reason for doing so is the Legitimate Interests Reason (see section 4 above) and there is something about your particular situation which means that you want to object to me processing your personal information. In certain circumstances

you have the right to object to processing where such processing consists of profiling (including profiling for direct marketing).

- 8.2 In addition to the rights set out in section 8.1, where I rely on consent as the legal reason for using your personal information, you have the right to withdraw your consent. Further details about this are set out in section 4.4.
- 8.3 If you want to exercise any of the above rights in relation to your personal information, please contact me using the details set out at the beginning of this policy. If you do make a request then please note:
- (a) I may need certain information from you so that I can verify your identity;
 - (b) I do not charge a fee for exercising your rights unless your request is unfounded or excessive; and
 - (c) if your request is unfounded or excessive then I may refuse to deal with your request.

9. Marketing

- 9.1 You may receive marketing from me about similar goods and services, where either you have consented to this, or I have another legal reason by which I can contact you for marketing purposes.
- 9.2 However, I will give you the opportunity to manage how or if I market to you. In any e-mail which I send to you, I provide a link to either unsubscribe or opt-out, or to change your marketing preferences. To change your marketing preferences, and/or to request that I stop processing your personal information for marketing purposes, you can always contact me on the details set out at the beginning of this policy.
- 9.3 If you do request that I stop marketing to you, this will not prevent me from sending communications to you which are not to do with marketing (for example in relation to services you have purchased from me).
- 9.4 I do not pass your personal information on to any third parties for marketing purposes.

10. Third Party Websites

My website contains links to third party websites. If you click and follow those links then these will take you to the third party website. Those third party websites may

collect personal information from you and you will need to check their privacy notices to understand how your personal information is collected and used by them.

11. Complaints

If you are unhappy about the way that I have handled or used your personal information, you have the right to complain to the Information Commissioner's Office (**ICO**). Please do contact me in the first instance if you wish to raise any queries or make a complaint in respect of our handling or use of your personal information, so that I have the opportunity to discuss this with you and to take steps to resolve the position. You can contact me using the details set out at the beginning of this privacy policy.