

Privacy Notice

We are Concorde House, 18 Margaret Street, Brighton BN2 1TS. Concorde House is a "data controller". This means that we are responsible for deciding how we hold and use personal data about you. We are required under the General Data Protection Regulation 2016 (the "GDPR") to notify you of the information contained in this Privacy Notice.

This Privacy Notice describes how we collect and use personal data about you prior to you being a client of the business, during the business-client relationship and once the relationship has ended. This notice does not form part of our business-client agreement with you.

1. What kinds of personal data about you do we process?

We will collect, store, and use the following categories of personal data about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- Date of birth, gender and/or age, your nationality and/or citizenship status
- Copies of driving licence and passport

2. What is the source of your personal data?

Most of the personal data we collect, store and use about you will be provided by you (or third parties authorised by you) as part of the business-client relationship to enable us to fulfil our contractual obligations to you under our business-client agreement.

We may also use and store personal data about you from information generated about you in fulfilling our contractual obligations under the business-client agreement.

3. How will we use your personal data and what are our legal grounds for processing your personal data?

We use your personal data primarily for the purpose of carrying out our business agreement with you. The situations in which we may use your personal data are set out below along with the legal grounds we will rely upon to process your data. Some of the legal grounds for processing will overlap and there may be several grounds which justify our use of your personal data.

a) The processing of your personal data is necessary for the performance of an business-client agreement or to enable us to take steps at your request prior to entering into an business-client agreement:

- To make a decision about whether we take you on as a client
- Determining the terms of our business-client agreement with you
- Keeping you up to date and reporting to you

b) The processing of your personal data is necessary for our legitimate interests of running the business

- To monitor and keep records of our communications with you and our staff

c) To comply with our legal obligations

- Accounting and auditing of our business
- To comply with any obligations under employment law and/or under the Employment Business Standards

Change of purpose

We will only use your personal data for those situations listed above, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, where this is required or permitted by law.

4. How we use particularly sensitive personal data about you and what are our legal grounds for processing this type of personal data

Special categories of particularly sensitive personal data and personal data relating to criminal convictions and offences require higher levels of protection. We need to have a further legal ground for collecting, storing and using this type of personal data. We may process special categories of personal data in the following circumstances:

- a) With your explicit consent
- b) Processing is necessary to protect your vital interests or those of another natural person
 - To collect, hold and disclose data concerning your health to third parties e.g. where disclosure of your health records is necessary for a medical emergency.
- c) The personal data we wish to process has manifestly been made public by you.
- d) Processing is necessary for the establishment, exercise or defence of legal claims or whenever Courts are acting in their judicial capacity.
- e) Processing is necessary for reasons of substantial public interest.

5. When do we share your personal data with other organisations or individuals?

We may share your personal data with third parties where required by law.

6. What if you don't want to share your personal data with us?

If you fail to provide certain information when requested, we may not be able to perform the business-client agreement we have entered into with you or we may be prevented from complying with our legal obligations to you.

7. What should you do if your personal data changes?

You should tell us, so we can update our records. The contact details for this purpose are in this Privacy Notice, otherwise please inform your usual contact at Concorde House.

8. How do we keep your data secure?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

9. For how long do we retain your personal data?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of the business-client agreement and satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Once you are no longer a client of the business we will retain your personal data for six months after the client relationship has ended at which time we will securely destroy your personal data.

10. Your duty to inform us of any changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your client relationship with us.

11. Rights of Access, Correction, Erasure, and Restriction

Your rights in connection with your personal data

Under certain circumstances, by law you have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to another party.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact Stephen Holroyd and/or Alan Kite in writing.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you:

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

12. Your right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Stephen Holroyd and/or Alan Kite. Once we have received notification that you have withdrawn your consent, we will no longer process your personal data for the purpose or purposes you originally agreed to, unless we have another legal ground for doing so in law.

13. Data Protection Officer

If you have any questions about this Privacy Notice or how we handle your personal data, please contact Stephen Holroyd and/or Alan Kite. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

14. Changes to this Privacy Notice

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

