

Privacy Statement

1 Contents

2	Introduction	2
3	Security.....	2
4	Data that we hold.....	2
4.1	Services.....	2
4.1.1	Why do we process data?.....	3
4.1.2	What data is processed?	3
4.1.3	How long do we hold data for?.....	3
4.2	Business Contacts	3
4.2.1	Why do we process data?.....	4
4.2.2	What data do we hold?	4
4.2.3	How long do we hold data for?.....	4
4.2.3.1.1	Statement	4
4.3	Our people.....	4
4.3.1	Applicants.....	4
4.4	Suppliers	4
4.4.1	Why do we process data?.....	4
4.4.2	What data do we hold?	5
4.4.3	How long do we hold data for?.....	5
5	People who visit our offices	5
5.1	Why do we process data?	5
5.2	What data do we hold?.....	6
5.3	How long do we hold data for?	6
6	People who use our website.....	6
6.1	Why do we process data?	6
6.2	What data do we hold?.....	6
7	Sharing personal data.....	7
8	Locations of processing	7
9	Individual’s Rights.....	8
10	Complaints.....	8
11	Data Controller and contact information	8
12	Changes to our privacy statement.....	8

2 Introduction

PHD Group (“we”, “us”, or “our”) is committed to protecting and respecting the personal data that we hold. This privacy statement describes why and how we collect and use personal data and provides information about individuals’ rights. It applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for the purposes described in this privacy statement or as made clear before collecting personal data.

Personal data is any information relating to an identified or identifiable living person. When collecting and using personal data, our policy is to be transparent about why and how we process personal data.

We process personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose are set out in the relevant sections below.

The personal data that is provided to us is provided either directly from the individual concerned, from a third party acting on behalf of an individual, or from publicly available sources (such as internet searches, Companies House).

Where we receive personal data that relates to an individual from a third party, we request that this third party inform the individual of the necessary information regarding the use of their data. Where necessary, reference may be made to this privacy statement.

3 Security

We take the security of all the data we hold seriously. Staff are trained on data protection, confidentiality and security.

We have a framework of policies and procedures which ensure we regularly review the appropriateness of the measures we have in place to keep the data we hold secure.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

4 Data that we hold

4.1 Services

We provide services to individuals as well as businesses, non-profits, and other organisations. The exact data held will depend on the services to be provided.

Where we engage with clients for services, we may collect and process personal data to satisfy a contractual obligation. We request that clients only provide the personal data that is required for us to fulfil our contractual obligation.

4.1.1 Why do we process data?

Where data is collected for professional services, it is used for several purposes, as follows;

- Providing services to clients. Data is processed in accordance with our letter of engagement between our clients and us and may sometimes be further clarified in written documentation supplied before any data processing may occur. We provide a range of professional services to our clients, which includes;
- Client management. When communicating with and assessing the needs of clients, personal data may be processed to ensure that their needs are appropriately satisfied. This may include assessing whether the collection of services is provided to our clients are appropriate.
- Administration. To manage and administer our business and services, we may collect and process personal data. This may include (but is not limited to) maintaining internal business records, managing client relationships, hosting events, administering client facing applications, and maintaining internal operating processes.
- Regulatory. To undertake services, we may from time to time be required to collect and process personal data in order to fulfil regulatory, legal or ethical requirements. This may include (but is not limited to) the verification of identity of individuals.

4.1.2 What data is processed?

The data that is processed is dependent on the service that is being provided and on the recipient of this service.

- Services to businesses, non-profits, and other organisations. We process the personal data of individuals associated with our clients. Personal data may include any relevant financial or non-financial information necessary for us to provide our services. As an example, this may include contact details, employee information (including details about dismissal), lists of shareholders, customers and suppliers and any other specifically relevant data.
- Services to individuals. Personal data may include contact details and tax identifiers, information about business activities, investments, and other financial interests, payroll and other income, and any other specifically relevant data.

4.1.3 How long do we hold data for?

We retain the personal data processed by us in a live environment for as long as is considered necessary for the purpose(s) for which it was collected (including as required by applicable law or regulation, typically 6 years). We may keep data for longer to establish, exercise, or defend our legal rights and the legal rights of our clients.

In addition, personal data may be securely archived with restricted access and other appropriate safeguards where there is a need to continue to retain it.

4.2 Business Contacts

Personal data from our contacts, which covers both potential and prior customers, as well as potential and prior employees, are held in our customer relationship management tool (CRM tool).

This information is entered into the system after contact is made between a staff member of PHD Group and a business contact individual.

We use technology profile our business contacts, so that we can assess the health of our relationship with our business contacts. We will rely on the appropriate condition for processing data.

4.2.1 Why do we process data?

Where personal data on business contacts is held, it is used for several purposes, as follows;

- Promote and develop our offerings.
- Communication of technical updates.
- Relationship management.
- Administration and management.

4.2.2 What data do we hold?

Personal data that may be stored in the CRM tool includes, but is not limited to, name, email address, physical address, job title, and details of the initial meeting.

In addition, personal data may be securely archived with restricted access and other appropriate safeguards where there is a need to continue to retain it.

4.2.3 How long do we hold data for?

4.2.3.1.1 Statement

We retain the personal data processed by us for as long as is considered necessary for the purpose(s) for which it was collected.

4.3 Our people

We collect personal data for our people as part of the administration, management and promotion of our business activities.

Our staff handbook explains further how personal data is held for our staff.

4.3.1 Applicants

Where an individual is applying to work for PHD Group, personal data is collected through the application process. Data is often collected through forms on the website, details of which can be found in the section describing people who use our website. Data collected via the website will be used for the purposes detailed below.

There are several purposes that personal data for applicants are collected.

- Employment. We process an applicant's personal data to assess their potential employment at PHD Group.
- Administration and management. We may also use this personal data to make informed management decisions and for administration purposes.

Personal data collected for applicants is held for as long as necessary to fulfil the purpose for which it was collected, or for a maximum of two years where those purposes no longer become necessary.

4.4 Suppliers

We collect and process personal data about our suppliers, subcontractors, and individuals associated with them. The data is held to manage our relationship, to contract and receive services from them, and in some cases to provide professional services to our clients.

4.4.1 Why do we process data?

- Receiving goods and services. We process personal data in relation to our suppliers and their staff as necessary to receive the services.
- Providing services to our clients. Where a supplier is helping us to deliver professional services to our clients, we process personal data about the individuals involved in

providing the services to administer and manage our relationship with the supplier and the relevant individuals and to provide such services to our clients.

- Administering, managing and developing our businesses and services. We process personal data to run our business, including:
 - managing our relationship with suppliers;
 - developing our businesses and services (such as identifying client needs and improvements in service delivery);
 - maintaining and using IT systems;
 - hosting or facilitating the hosting of events; and
 - administering and managing our website and systems and applications.
- Security, quality and risk management activities. We have security measures in place to protect our and our clients' information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to our suppliers. We collect and hold personal data as part of our supplier contracting procedures. We monitor the services provided for quality purposes, which may involve processing personal data.
- Promoting our services. We may use business contact details to provide information that we think will be of interest about us and our services. For example, industry updates and insights, other services that may be relevant and invites to events.
- Complying with any requirement of law, regulation or a professional body of which we are a member. We are subject to legal, regulatory and professional obligations. We need to keep certain records to show we comply with those obligations and those records may contain personal data.

4.4.2 What data do we hold?

We will hold supplier's names, contacts names, and contact details of suppliers.

4.4.3 How long do we hold data for?

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation). Data may be held for longer periods where required by law or regulation and to establish, exercise or defend our legal rights.

5 People who visit our offices

We have security in place at our offices, for the physical security of client information and for the benefit of our staff.

Signs in our office reception confirm that CCTV is in operation. The images are held securely and only accessed when needed when investigating an incident.

To hold and process the visitor details and CCTV, we believe it is a legitimate business interest that visitors are captured and controlled in this way.

5.1 Why do we process data?

CCTV and building access controls and may require visitors to our offices to sign in at reception and keep a record of visitors. This is retained in case of theft or other incident and to protect the staff and information in the office.

5.2 What data do we hold?

Personal data that may be stored on CCTV will be footage of those visiting our offices.

Our visitor book may include name, business, times and car registration.

5.3 How long do we hold data for?

Visitor records are accessed on a need to know basis only. CCTV recordings are typically overwritten after a brief period of time unless we identify an issue requiring investigation.

6 People who use our website

When people visit our website, personal data is collected both through automated tracking and interacting with various forms on the website or apps (collectively referred to as the websites).

Personal data may be collected when individuals fill in forms on our websites or by corresponding with us by phone, e-mail or otherwise. This includes information provided when an individual registers to use our websites, subscribe to our service, make an enquiry, comment on publications, enter a competition, promotion or survey, apply to work for a PHD Group business and report a problem with our websites.

When individuals visit our websites, certain personal data may be automatically collected. We also work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies).

Often, individuals who visit our website additionally fall into another category as listed by this privacy statement. For instance, users of our websites may be current clients, business contacts or become clients in the future. Where this is the case, data held and processed for individuals who use our website may also become data that is held and processed for another purpose.

6.1 Why do we process data?

There are several reasons why we will process the personal data that an individual may provide to us when visiting our websites. As examples, these include;

- **Administration.** In to administer our site and to improve internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes. For example, we use this data to ensure that the website is presented well for individuals and is optimised appropriately.
- **Functionality.** To allow individuals to use some functionality of our website, certain personal data must be entered for features to work as intended.
- **Security.** To keep our site safe and secure, we may sometimes collect personal data, for instance login information and other data that can be used to vouch an individual's identity.
- **Promote and develop our offerings.** Some personal data may be used to measure or understand the effectiveness of advertising we serve to individuals, and to ensure that only relevant advertising appears.

6.2 What data do we hold?

The data that we hold depends on what data was entered and for what purpose.

Where data was entered to engage with functionality of our website, that personal data may include their name, address, e-mail address and phone number, financial and credit card information, personal description and photograph.

Where data is collected automatically, the data that we may collect includes technical information, including the Internet protocol (IP) address used to connect an individual's computer to the Internet, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

Other data about an individual's visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

Our website uses cookies to distinguish individuals from one another. This helps us to provide a better experience when individuals browse our website and allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy.

7 Sharing personal data

We will only share personal data with others when we are legally permitted to do so. When we share data with others, we put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality and security standards.

Personal data held by us may be transferred to:

Third party organisations that provide applications/functionality, data processing or IT services to us

We use third parties to support us in providing our services and to help provide, run and manage our internal IT systems. For example, providers of information technology, cloud-based software as a service provider, identity management, website hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are in secure data centres around the world, and personal data may be stored in any one of them.

Third party organisations that otherwise assist us in providing goods, services or information

PHD Group and group businesses.

Auditors and other professional advisers

Law enforcement or regulatory agencies or those required by law or regulations

Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

8 Locations of processing

The data that we collect from you may be transferred to and stored at a destination outside the European Economic Area ("EEA"). By submitting your personal data, you agree to this transfer, storing or processing.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and Data Protection 2018 regulations.

9 Individual's Rights

Individuals have certain rights over their personal data and PHD Group are responsible for fulfilling these rights as follows:

- Individuals may request access to their personal data held by us as a data controller.
- Individuals may request us to rectify personal data submitted to us or, where appropriate, contact us via the relevant website registration page or by amending the personal details held on relevant applications with which they registered.
- Individuals may request that we erase their personal data
- Where we process personal data based on consent, individuals may withdraw their consent at any time by contacting us or clicking on the unsubscribe link in an email received from us.
- Individuals may have other rights to restrict or object to our processing of personal data and the right to data portability.
- Individuals may request information about, or human intervention into, any automated data processing that we may undertake.

If you wish to exercise any of these rights, please send an email to dpo@phdgroup.co.uk.

10 Complaints

We hope that you won't ever need to, but if you do want to complain about our use of personal data, please send an email with the details of your complaint to dpo@phdgroup.co.uk. We will investigate and respond to any complaints we receive.

You also have the right to lodge a complaint with the UK data protection regulator, the Information Commissioner's Office ("ICO"). For further information on your rights and how to complain to the ICO, please refer to the ICO website <https://ico.org.uk/concerns>

11 Data Controller and contact information

The data controller for PHD Group and its associated businesses is PHD Group.

If you have any questions about this privacy statement or how and why we process personal data, please contact us at:

Head of Data Privacy

54 Oxford Road, Denham, UB9 4DN

dpo@phdgroup.co.uk

12 Changes to our privacy statement

Updates to this privacy statement will appear on this website. This privacy statement was last updated on 10th April 2019.