

## Privacy Notice

Data controller: Concirus Ltd. The Leather Market, 17 Leathermarket Street, London SE1 3HN, registered company number 07793895 (the 'Organisation').

Data protection officer: Chris Kirkham [dpo@concirus.com](mailto:dpo@concirus.com) or 0845 565 0549

## Introduction

This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.

We take seriously the protection of your privacy and confidentiality. We understand that all users of our website and our products and services are entitled to know that their personal data will not be used for any purpose unintended by them and will not accidentally fall into the hands of a third party.

Our policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

## Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the organisation to change incorrect or incomplete data;
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing; and
- ask the organisation to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the DPO as above.

If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner.

## The bases on which we process information about you

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data. If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

## Information we process because we have a contractual obligation with you

When you buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us. In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- verify your identity for security purposes
- sell products to you
- provide you with our services
- provide you with suggestions and advice on our products and services

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to a particular service we provide. If we use it for this purpose, you as an individual will not be personally identifiable.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract and such time beyond as may be necessary to fulfil our legitimate interest or statutory obligations.

## Information we process with your consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including job opportunities and our products and services, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.

Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply or by participating in marketing promotions at events.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our website.

If you have given us explicit permission to do so, we may send you details via newsletters on our services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us at [dpo@concirus.com](mailto:dpo@concirus.com). However, if you do so, you may not be able to use our website or our services further.

## Information we process for the purposes of legitimate interests

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

- record-keeping for the proper and necessary administration of our business
- responding to unsolicited communication from you to which we believe you would expect a response
- protecting and asserting the legal rights of any party
- insuring against or obtaining professional advice that is required to manage business risk
- protecting your interests where we believe we have a duty to do so

## Information we process because we have a legal obligation

Sometimes, we must process your information in order to comply with a statutory obligation. For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order. This may include your personal information.

## Job application and employment

If you send us information in connection with a job application, we may keep it for up to 3 years in case we decide to contact you at a later date.

If we employ you, you will be provided with a specific Privacy Policy as part of your contract pack.

## Sending a message to our support team

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need. We record your request and our reply in order to increase the efficiency of our business.

We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

## Complaining

When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

## Affiliate and business partner information

This is information given to us by you in your capacity as an affiliate of us or as a business partner. We undertake to preserve the confidentiality of the information and of the terms of our relationship.

## Cookies

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another.

Our website does not use cookies.

## Personal identifiers from your browsing activity

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you, this may include the use of visitor tracking software such as Google Analytics.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

## Information we obtain from third parties

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

## Data may be processed outside the EEA

We use outsourced services in countries outside the European Union from time to time in the provision of our products and services. Accordingly, data obtained within the UK or any other country could be processed outside the European Union.

## Access to your personal information

To obtain a copy of any information that is not provided on our website you may send us a request at [dpo@concirrus.com](mailto:dpo@concirrus.com).

After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

## Removal of your information

If you wish us to remove personally identifiable information from our services, you may contact us at [dpo@concirrus.com](mailto:dpo@concirrus.com).

This may limit the service we can provide to you.

## Verification of your information

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

## Use of site by children

We do not sell products or provide services for purchase by children, nor do we market to children.

If you are under 13, you may use our website only with consent from a parent or guardian

## How you can complain

If you are not happy with our privacy policy or if have any complaint, then you should tell us by email. Our address is [dpo@concirrus.com](mailto:dpo@concirrus.com).

If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns/>

## Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- to provide you with the services you have requested;
- to comply with other law, including for the period demanded by our tax authorities;
- to support a claim or defence in court.

## Compliance with the law

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we would like to hear from you.

## Review of this privacy policy

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us at [dpo@concirus.com](mailto:dpo@concirus.com).