

## PRIVACY POLICY

This privacy notice sets out the basis on which your personal data will be processed by us.

This privacy notice applies to you if we process your personal information and you are not an employee or worker of ours, a prospective candidate employee or worker or an individual to whom we have provided a specific privacy notice. You may, for example, be an individual that is a business contact of ours or another organisation that we deal with, an attendee at one of our events, a user of our website. This privacy notice does not form part of any contract you or the organisation you work for may have with us.

References to **we**, **our** or **us** in this privacy notice are to **Creative Communications Group**.

Our Data Protection Officer (DPO) has overall responsibility for data protection compliance in our organisation. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO. Contact details are set out in the "**Contacting us**" section at the end of this privacy notice.

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your relationship with us. This notice explains how we comply with the law on data protection and what your rights are. For the purposes of data protection the company in our Group which is processing your personal information will be the controller of any of your personal information.

### 1. PERSONAL INFORMATION WE COLLECT

We may collect the following types of personal information about you:

- **Contact details:** information that allows us to identify and contact you directly such as your name, address, email address and telephone number;
- **Identification information:** passport and other official identification details, Companies House information, national insurance number, membership of relevant schemes;
- **Details of your work history:** may include positions, roles, responsibilities, professional qualifications.
- **Advisors appointed by you:** including funders, lawyers, financial advisors, surveyors, guarantors of your commitments;
- **Business and financial information:** including bank accounts, payroll and tax status, tax or governmental identifiers regarding any relevant property taxes, property records, searches, documents and files (including our legal files);
- **Responses to surveys, competitions and promotions:** we keep records of any surveys you respond to or your entry into any competition or promotion we run;
- **Creditworthiness:** We may undertake investigations into your creditworthiness in order to establish whether to enter into or continue a business relationship with you for example from a credit reference agency;
- **Details of your performance:** when working with or for us or in relation to any project or work we are engaged in;
- **How you use our website:** we collect information about the pages you look at and how you use them;

- **Videos, photographs and audio recordings:** which you or other people take and provide to us or we take ourselves including other information obtained through electronic means such as swipecard and key fob records;
- **Details of the correspondence (including e-mail correspondence) you send and receive from us and details of any claims:** this includes enquiries, complaints, letters and emails, SMS, MMS and other electronic communication; and
- **Use of our information and communications systems** including, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information.

## 2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We do not generally collect, store and use the following “special categories” of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- information about any trade union memberships;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information; and
- biometric information about you, for example fingerprints, retina scans.

If we do collect any special category personal information, we do not currently rely on consent as a basis for processing special category personal information.

We will also not collect, store and use any criminal records information in relation to you. If we do collect any criminal records information, we do not currently rely on consent as a basis for processing criminal records information.

## 3. SOURCES WE COLLECT YOUR PERSONAL INFORMATION FROM

We will collect personal information from a number of sources. These may include the following:

- **Directly from you:** when you indicate that you may wish to obtain information or attend an event, complete forms we provide to you, use our website/other social media platforms, enter our competitions and promotions, make a claim, make a complaint, contact us by phone, email or communicate with us directly in some other way.
- **Third parties authorised by you:** such as a family member or someone else authorised by you;
- **From referrals and recommendations:** usually given by other people who know you or have a working relationship with you.
- **Our website:** provides us with information about how you use it and the devices that you use to connect to our website.
- **Providers of information:** which may include professional bodies or trade associations, credit reference agencies, Companies House, the Land Registry, LinkedIn and other web platforms.
- **Journalists or other investigators:** they may provide us with details or make enquires about you or matters concerning you or ourselves.
- **Your employer or the organisation you work for:** they may provide us with your name, position contact details and background information about you.
- **Our professional advisors:** such as lawyers, accountants, and other consultants and advisors.

- **The Government, local authorities or relevant regulators:** to assist with investigations, for example the Information Commissioner's Office.

We may also collect additional personal information throughout the course of a property transaction.

#### 4. WHAT WE USE YOUR PERSONAL INFORMATION FOR

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this. Which will apply will depend upon the nature of your relationship and interactions with us.

Purpose	Personal information used	Lawful basis
<b>Identity and credit checks and passing details of our checks to third parties</b>	All the personal information we collect	We may have a legal obligation to undertake identification and credit checks and to provide those details to third parties  We and a third party also have a legitimate interest in knowing your identity and carrying out credit checks and ensuring that we are likely to be paid
<b>Enter into and perform contracts, where we may be supplying products/services to you and/or you may be supplying products/services to us or we may be involved in similar arrangements with third parties</b>	All the personal information we collect	To enter into and perform contracts with either yourself or the organisation that you represent  We have a legitimate interest to properly perform contracts with third parties
<b>Deal with your queries or complaints, claims, legal disputes or raise queries, claims, legal disputes or complaints with you</b>	All the personal information we collect	This may be necessary to perform a contract with you or the organisation that you represent  We have a legitimate interest to improve the services and/or products we provide/supply  To defend, bring or establish legal claims
<b>Maintain and improve our services and/or products</b>	All the personal information we collect	We have a legitimate interest to improve the services and/or products we provide/supply or have provided/supplied to us
<b>Data analytics and statistical analysis to help us improve our online services</b>	How you use our website	We have a legitimate interest to improve the online services we provide and user experience



<b>contracts and completion of a property transaction</b>		
<b>To provide you with requested information</b>	Contact details and services and products or other information that you have requested we provide to you or your organisation	To comply with any request made by you
<b>To hold and publicise events in print or on social media platforms</b>	Your contact details, details of attendance, your comments in response forms and photos and/or videos	We have a legitimate interest in holding and publicising events and tracking attendance
<b>To comply with our legal and regulatory obligations</b>	All the personal information we collect	To comply with any legal and regulatory obligation or requirement
<b>Fraud, crime prevention and debt collection</b>	All the personal information we collect	We have a legitimate interest to detect and prevent crime and to collect debts.
<b>Gain access to sites and buildings</b>	All the personal information we collect	To comply with legal obligations and/or the establishment, exercise or defence of legal claims
<b>To manage our relationship with you and to operate our business</b>	All the personal information we collect	We have a legitimate interest to operate our business in an efficient way  To enter into and perform contracts with either yourself or the organisation that you represent
<b>Providing to you portal and/or website access and for the purposes of ensuring the security of our systems and our information including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution</b>	All the personal information we collect about you	We have a legitimate interest in ensuring our premises and systems are secure and to be able to manage and perform our contracts
<b>Storage of records relating to you and also records relating to our business</b>	All the personal information we collect	To be able to manage and fulfil any contract with you, we may have a legal obligation to do so and we also have a legitimate interest to keep proper records
<b>Managing our relationship with you, dealing with and managing the exchange of</b>	All the personal information we collect	We need this information to be able to enter into, manage and perform our contract with you

For some of your personal information you may have a legal, contractual or other requirement or obligation to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to properly perform our contract with you or the organisation you represent or comply with legal obligations and we may have to terminate our relationship. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our arrangements with you or the organisation you represent.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the “**Contacting us**” section below. .

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to invite you to our events.

We may anonymise and aggregate any of the personal information we hold (so that it does not directly identify you). We may use anonymised and aggregated information for purposes that include testing our IT systems, research, data analysis, improving our site and offering new services.

## 5. WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We may share personal information with the following parties:

- **Credit reference and other identification agencies:** so that we can assess your creditworthiness and to verify your identity. These agencies may retain a footprint that a search has been undertaken;
- **Third parties who ask for or want referrals:** we may provide your details to a third party who is seeking services/products which are the same or similar to those that you provide;
- **Other service providers and advisors to us:** such as companies that support our IT, help us analyse the data we hold, process payments, send communications to our clients, provide us with legal, property or financial advice and generally help us deliver products and services to you or the organisation that you represent or for us to purchase them from you or the organisation you represent;
- **Information providers:** which may include credit reference agencies, Companies House, HMRC, Land Registry;
- **Purchasers of our business:** buyers or perspective buyers to whom we sell or negotiate to sell our business;
- **The Government, local authorities, planning authorities or relevant regulators:** where we are required to do so by law or to assist with their investigations, for example the Information Commissioner's Office; and
- **Police, law enforcement agencies and security services:** to assist with the investigation and prevention of crime and the protection of national security.

We also use Google Analytics which sets cookies to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website and blog, where visitors have come to the website from and the pages they visited. To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

We do not disclose personal information to anyone else except as set out above unless we have your consent or we are legally obliged to do so. We do not sell your data.

## 6. MARKETING

**Email marketing:** from time to time, we may contact existing clients by email with information about products/services we believe you may be interested in.

You can let us know at any time that you do not wish to receive marketing messages by sending an email to your usual contact. We do not otherwise contact people for marketing purposes.

## 7. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect about you is not transferred to or stored in countries outside of the UK or European Union except as set out in this section.

Our directors and other individuals working for us may in limited circumstances access personal information outside of the UK and European Union if they are on holiday abroad outside of the UK or European Union. If they do so they will be using our security measures and will be subject to their arrangements with us which are subject to English Law and the same legal protections that would apply to accessing personal data within the UK.

In limited circumstances the people to whom we may disclose personal information as mentioned in the section “**Who We Share Your Personal Information With**” may be located outside of the UK and European Union. In these cases we will impose any legally required protections to the personal information as required by law before it is disclosed.

If you require more details on the arrangements for any of the above then please contact us using the details in the “**Contacting us**” section below.

## 8. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR

We will keep your personal information for as long as is necessary for the purpose for which it has been obtained and then for as long as there is any risk of a potential claim, which will be dependent upon the limitation period for the particular type of claim. We have set out below the main retention periods which will apply:

- For individual contacts with clients and suppliers this will be for as long as we continue to have a relationship with that client or supplier and then for a period of 2 years afterwards;
- For website users it will generally be a period of 1 year after you used our website;
- For individuals seeking information, making complaints or otherwise corresponding with us it will generally be 6 years;
- For individuals attending an event it will generally be a period of 12 months after the event.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you move position or work for a different organisation or change your phone number or email address. You can contact your usual contact within our organisation or by sending an email to [katie@creativecommunicationsgroup.co.uk](mailto:katie@creativecommunicationsgroup.co.uk)

## 9. YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;



- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example we do not use automated decision making in relation to your personal data. However some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting us**" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

## **10. CHANGES TO THIS NOTICE**

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

## **11. CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email [katie@creativecommunicationsgroup.co.uk](mailto:katie@creativecommunicationsgroup.co.uk)