### **Jac Strategy Ltd Privacy Notice**

We respect your privacy and are committed to protecting your information. This privacy notice aims to give you information on how JAC Strategy Ltd collects and processes your personal data.

JAC Strategy Ltd is the data controller and responsible for your personal data. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact: info@iac-strategy.com

Data protection, privacy and security are important to us, and we shall only use your personal information for specified purposes and shall not keep such personal information longer than is necessary to fulfil these purposes.

The Data Collected, and Why:

We collect or use the following information to provide services and goods, including delivery:

 Names and contact details, Addresses, Website user information (including user journeys and cookie tracking), Records of meetings and decisions

We collect or use the following information for the operation of customer accounts and guarantees:

 Names and contact details, Addresses, Account information, including registration details, Marketing preferences

We collect or use the following information for service updates or marketing purposes:

Names and contact details, Addresses, Website and app user journey information

Lawful bases

Our lawful bases for collecting or using personal information to provide services and goods are:

- Consent
- Contract

Our lawful bases for collecting or using personal information for **the operation of customer accounts** and quarantees are:

• Consent, Contract

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

• Consent, Contract

Where we get personal information from

• People directly

# **Data Security**

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 only.

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

#### **Data Retention**

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 satisfying any legal, accounting, or reporting requirements. Typically this will remain for 5 years.

# Your data protection rights

Under data protection law, you have rights including:

- Your right of access You have the right to ask us for copies of your personal data.
- Your right to rectification You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure You have the right to ask us to erase your personal data in certain circumstances.
- Your right to restriction of processing You have the right to ask us to restrict the processing of your personal data in certain circumstances.
- Your right to object to processing You have the right to object to the processing of your personal data in certain circumstances.
- Your right to data portability You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances
- Your right to withdraw consent When we use consent as our lawful basis you have the right to withdraw your consent.

You don't usually need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you. To make a data protection rights request, please contact us using the email at the top of this privacy notice.

## How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice. If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the <u>ICO</u>.

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