

Privacy Policy

1. Who is responsible for looking after your personal data?

Ispire MC Ltd is responsible for collecting information about you and be principally responsible for looking after your personal data (your Data Controller).

You should be aware that although Ispire MC Ltd may be principally responsible for looking after your personal data, information may be held in databases which can be accessed by other companies. When accessing your personal data, Ispire MC Ltd will comply with the standards set out in this Policy.

2. What personal data do we collect?

We may collect and process non-sensitive as well as sensitive personal data and personal data relating to criminal convictions and offences.

Business Partners and Visitors	
Contact Details	<ul style="list-style-type: none">• Name,• Work address,• Work email,• Work telephone numbers,• Job title
Marketing	<ul style="list-style-type: none">• Name,• Job title,• Email address,• Interests / marketing list assignments,• Record of permissions or marketing objections,• Website data (including online account details, IP address and browser generated information)
Office Visitors	<ul style="list-style-type: none">• Name,• Job title,• Email address,• Telephone number,• CCTV images,• Dietary preferences (for events),• Disability data (voluntarily provided)

Business Partners and Visitors. If you are a business partner, we will collect your business contact details. We may also collect information about your professional expertise and experience. We may collect your contact details, if you visit our website, register for a newsletter or attend one of our events. If we collect personally identifiable information through our website, we will make it clear when we collect personal information and will explain what we intend to do with it. Ispire MC Ltd may also collect Personal Data of Users who access our websites or of those who decide to consent, in the appropriate online sections, to receive newsletters from Ispire MC Ltd or to participate at one of the events organized by one of the companies of the group. If we collect personally identifiable information through

our website, we will make it clear when we collect personal information and will explain what we intend to do with it.

3. When do we collect your personal data?

Business Partners and Visitors

- We will collect information about you if you or your company provides your contact or other information to us in the course of working with us, either directly as a business partner or as a representative of your company.
- We may also collect information about you if you attend meetings, events or conferences that we organise, contact us through our website or sign up to one of our newsletters or bulletin services.
- We may collect information from other public sources (e.g. your website, social media or offline sources) where we believe this is necessary to help manage our relationships with our business partners.

4. What do we use your personal data for?

We use your personal data for the purposes set out below.

Business Partners and Visitors . If you are a business partner we will use your personal data to manage our relationship with you, including sending you marketing materials (where we have appropriate permissions) and to invite you to events. Where relevant, we will use your personal data to deliver or request the delivery of services, and to manage and administer our contract with you or with your employer. If you are a visitor, we will use your personal data; typically, to register for certain areas of our website, enquire for further information, distribute requested reference materials, or invite you to one of our events. Ispire MC Ltd also uses the data of users registering through its websites to send them promotional materials or invitations to events.

Data analytics. We routinely analyse information in our various systems and databases to help improve the way we run our business, to provide a better service and to enhance the accuracy of our risk and other actuarial models. We take steps to protect privacy by aggregating and where appropriate anonymising data fields before allowing information to be available for analysis.

5. Protecting your privacy

We will make sure that we only use your personal data for the purposes set out in Section 4 where we are satisfied that:

- you have provided your consent to us using the data in that way our use of your personal data is necessary to perform a contract or take steps to enter into a contract with you
- our use of your personal data is necessary to comply with a relevant legal or regulatory obligation that we have (e.g. to comply with a regulatory obligation imposed by any competent regulatory authority), or
- our use of your personal data is necessary to support 'legitimate interests' that we have as a business (for example, to improve our products, or to carry out analytics across our datasets), provided it is conducted at all times in a way that is proportionate, and that respects your privacy rights.

Before collecting and/or using any Sensitive Personal Data we will establish a lawful exemption which will allow us to use that information. If your Sensitive Personal Data is collected on a form (including on a website) or over the telephone, further information about the exemption may be provided on that form. This exemption will typically be:

- your explicit consent (if this is specifically requested from you on a data collection form, in language which references your consent);
- the establishment, exercise or defence by us or third parties of legal claims; or
- a specific exemption provided under local laws of EU Member States and other countries implementing the GDPR which is relevant to the consulting industry.

PLEASE NOTE. If you provide your explicit consent to permit us to process your Personal Data or Sensitive Personal Data, you may withdraw your consent to such processing at any time.

6. Who do we share your personal data with?

We work with many third parties, to help manage our business and deliver services. These third parties may from time to time need to have access to your personal data.

We may be under legal or regulatory obligations to share your personal data with courts, regulators, law enforcement or in certain cases other insurers. If we were to sell part of our businesses we would need to transfer your personal data to the purchaser of such businesses.

7. Direct Marketing

We may use your personal data to send you direct marketing communications about our products or our related services. This may be in the form of email, post, SMS, telephone or targeted online advertisements. When marketing to consumers, or where otherwise required by applicable law, we will target marketing to you only if you have provided your consent for marketing, unless marketing relates to the same or similar products and services which we have marketed to you previously and therefore received your contact information.

We may target marketing to companies if it has not explicitly denied such marketing.

In most cases our processing of your personal data for marketing purposes is based on our legitimate interests to provide information you might find helpful to thrive in this world and offers that may be of interest to you, although in some cases (such as where required by law) it may be based on your consent. You have a right to prevent direct marketing of any form at any time - this can be exercised by following the opt-out links in electronic communications, or by contacting us using the details set out in Section 11.

We take steps to limit direct marketing to a reasonable and proportionate level, and to send you communications which we believe may be of interest or relevance to you, based on the information we have about you.

8. International Transfers

From time to time we may need to share your personal data with other Business Partners who may or may not be based within the United Kingdom.

We will always take steps to ensure that any international transfer of information is carefully managed to protect your rights and interests:

- We will always take steps to ensure that any international transfer of information is carefully managed to protect your rights and interests:
- We will only transfer your personal data to countries which are recognised as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights.
- Transfers within Ispire MC Ltd and Business Partners may at our sole discretion be covered by a data transfer agreement which gives specific contractual protections (known as ‘standard contractual clauses’) designed to ensure that your personal data receives an adequate and consistent level of protection wherever it is transferred;
- Any requests for information we receive from law enforcement or regulators will be carefully checked before personal data is disclosed.

9. How long do we keep your personal data?

We will retain your personal data for as long as is reasonably necessary for the purposes listed in Section 4 of this Policy. In some circumstances we may retain your personal data for longer periods of time, for instance where we are required to do so in accordance with legal, regulator, tax or accounting requirements.

In specific circumstances we may also retain your personal data for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal data or dealings.

We maintain a data retention policy which we apply to records in our care. Where your personal data is no longer required we will ensure it is either securely deleted or stored in a way which means it will no longer be used by the business.

10. What are your rights

You have a number of rights in relation to your personal data.

You may request access to your data, correction of any mistakes in our files, erasure of records where no longer required, restriction on the processing of your data, objection to the processing of your data, data portability and various information in relation to any Automated Decision Making and Profiling or the basis for international transfers. More information about each of these rights can be found by clicking on the relevant link or by referring to the table set out further below.

To exercise your rights you may contact us as set out in Section 11. Please note the following if you do wish to exercise these rights:

Right	What this means
Access	<p>You can ask us to:</p> <ul style="list-style-type: none">• confirm whether we are processing your personal data;• give you a copy of that data;• provide you with other information about your personal data such as what data we have, what we use it for, who we disclose it to, whether

	<p>we transfer it abroad and how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any Automated Decision Making or Profiling, to the extent that information has not already been provided to you in this Policy.</p>
Rectification	<p>You can ask us to rectify inaccurate personal data.</p> <p>We may seek to verify the accuracy of the data before rectifying it.</p>
Erasure	<p>You can ask us to erase your personal data, but only where:</p> <ul style="list-style-type: none"> • It is no longer needed for the purposes for which it was collected; or • You have withdrawn your consent (where the data processing was based on consent); or • Following a successful right to object (see 'Objection' below); or • It has been processed unlawfully; or • To comply with a legal obligation to which Ispire MC Ltd is subject. <p>We are not required to comply with your request to erase your personal data if the processing of your personal data is necessary:</p> <ul style="list-style-type: none"> • For compliance with a legal obligation; or • For the establishment, exercise or defence of legal claims; <p>There are certain other circumstances in which we are not required to comply with your erasure request, although these two are the most likely circumstances in which we would deny that request</p>
Restriction	<p>You can ask us to restrict (i.e. keep but not use) your personal data, but only where:</p> <ul style="list-style-type: none"> • Its accuracy is contested (see Rectification), to allow us to verify its accuracy; or • The processing is unlawful, but you do not want it erased; or • it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or • You have exercised the right to object, and verification of overriding grounds is pending. <p>We can continue to use your personal data following a request for restriction, where:</p> <ul style="list-style-type: none"> • we have your consent; or • to establish, exercise or defend legal claims; or • To protect the rights of another natural or legal person.
Portability	<p>You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it 'ported' directly to another Data Controller, but in each case only where:</p>

	<ul style="list-style-type: none"> • The processing is based on your consent or on the performance of a contract with you • The processing is carried out by automated means. <p>The right to portability includes only the data provided by you.</p>
Objection	<p>You can object to any processing of your personal data which has our 'legitimate interests' as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.</p> <p>Once you have objected, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.</p>
Withdrawal	<p>Where the processing of your personal data is based on consent, you can withdraw your consent to the processing of your personal data at any time. The withdrawal of your consent shall not affect the lawfulness of processing based on consent before your withdrawal</p>
International Transfers	<p>We may redact data transfer agreements or related documents (i.e. obscure certain information contained within these documents) for reasons of commercial sensitivity.</p>
Identity	<p>We take the confidentiality of all records containing personal data seriously, and reserve the right to ask you for proof of your identity if you make a request in respect of such records.</p>
Fees	<p>We will not ask for a fee to exercise any of your rights in relation to your personal data, unless your request for access to information is unfounded, repetitive or excessive, in which case we will charge a reasonable amount in the circumstances. We will let you know of any charges before completing your request.</p>
Timescales	<p>We aim to respond to any valid requests within one month unless it is particularly complicated or you have made several requests in which case we aim to respond within three months. We will let you know if we are going to take longer than one month. We might ask you if you can tell us what exactly you want to receive or are concerned about. This will help us to action your request more quickly.</p>
Third Party Rights	<p>We do not have to comply with a request where it would adversely affect the rights and freedoms of other data subjects.</p>

11. Contact and complaints

The primary point of contact for all issues arising from this Policy, including requests to exercise data subject rights, is our Data Protection Officer.

The Data Protection Officer can be contacted in the following ways:

Email:

graham@ispiremc.com

Write to:

Data Protection Officer

Ispire MC Ltd

11 Lincoln Close

Bishops Stortford

CM23 4EX

Dated: February 2023