



Investigate Inclusive Ltd customer privacy notice

This privacy notice tells you what to expect us to do with your personal information.

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What information we collect, use, and why

Generally, we collect personal data from our clients or from third parties when providing services to the relevant client.

Our policy is to collect only the personal data necessary for agreed purposes and we ask our clients to only share personal information with us where it is required for those purposes and in accordance with relevant data privacy laws.

Where we need to process personal information to provide services, we ask our clients to provide the necessary information to the data subjects regarding its use. Our clients may use relevant sections of this Privacy Statement or refer data subjects to this Privacy Statement if they consider it appropriate to do so.

The categories of personal data processed by us in relation to the services we provide are numerous and it is not possible to provide an exhaustive list. However, they may include:

- personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
- date of birth;
- gender;
- marital status and dependents;
- salary, annual leave, pension and benefits information;
- start date;
- location of employment or workplace;
- recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process);
- employment records (including job titles, work history, working hours, training records and professional memberships);
- compensation history;

- performance information;
- disciplinary and grievance information.
- CCTV footage and other information obtained through electronic means such as swipecard records;
- internal communications such as emails, text messages and messages sent via instant messaging systems and applications;
- information about use of information and communications systems; and
- photographs.

For certain services or activities, we may process special categories of personal data, including:

- information about race or ethnicity, religious beliefs, sexual orientation and political opinions;
- information about trade union membership;
- information about health, including any medical condition, health and sickness records; and
- information about criminal convictions and offences.

We operate a client relationship management database which includes details of individual contacts employed by our current, former and prospective clients together with other professional contacts we have. The information we hold includes individual contact details, details of our interactions, past work and work opportunities and any other information relevant to our relationship. This information is processed for our legitimate business purposes of marketing our services to interested persons, operating our business and managing our client and other external relationships. We do not systematically share marketing information with third parties.

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [You can read more about this right here.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [You can read more about this right here.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [You can read more about this right here.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [You can read more about this right here.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [You can read more about this right here.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [You can read more about this right here.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [You can read more about this right here.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Use of personal information

We use personal data for the purposes set out below. Providing professional services We provide a range of professional services. Some of our services require us to process personal data in order to provide carry out our contractual obligations.

Legal grounds: Legitimate interests, legal obligation, public interest or consent

This processing of personal information by us is necessary for the purposes of the legitimate interests pursued by us in providing professional services and our client in receiving professional services as part of running their organisation. Where we process special categories of personal data, we rely on a relevant public interest condition or consent.

Administering, managing and developing our businesses and services We may process personal data in order to run our business, including:

- managing our relationship with clients and prospective clients; • 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.

Legal grounds: Legitimate interests

This processing is necessary for the purposes of the legitimate interests pursued by us to administer, manage and develop our business and services. 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 monitor the services provided to clients for quality purposes, which may involve processing personal data stored on the relevant client file. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to client engagements. We collect and hold personal data as part of our client engagement and acceptance procedures.

Legal grounds: Legitimate interests

This processing is necessary for the purposes of the legitimate interests pursued by us to ensure network and information security, manage risks to our business and check the quality of our services. Providing our clients and prospective clients with information about us and our range of services Unless we are asked not to, we use client and prospective client 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.

Legal grounds: Legitimate interests

This processing is necessary for the purposes of the legitimate interests pursued by us to promote our business and services. Complying with any requirement of law, regulation or a professional body of which we are a member As with any provider of professional services, we may be subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with any such obligations and those records may contain personal data.

Legal grounds: Legal obligation or legitimate interests

This processing is necessary for us to comply with a legal obligation and, where we do not have a legal obligation, we have a legitimate interest in processing personal data as necessary to meet our regulatory or professional obligations. Other business-related purposes We are continually looking for ways to help our clients and improve our business and services. Where agreed with our clients, we may use information that we receive in the course of providing professional services for other lawful purposes, including analysis to better understand a particular issue, industry or sector, provide insights back to our clients, to improve our business, service delivery and offerings To the extent that the

information we receive in the course of providing professional services contains personal data, we will de-identify the data prior to using the information for these purposes.

Legal grounds: Legitimate interests We have a legitimate interest in de-identifying data to help our clients, to improve our business, service delivery and offerings and to develop new technologies and offerings, including by performing benchmarking and analysis.

Where we get personal information from

- Directly from you
- From records kept by the client organisation

How long we keep information

- 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). In the absence of specific legal, regulatory or contractual requirements, our baseline retention period for records and other documentary evidence created in the provision of services is 6 years. The exception to this is video and audio recordings obtained during the course of interviews, which are deleted after a period of 41 days unless otherwise agreed. Personal data may be held for longer periods where extended retention periods are required by law or regulation and in order to establish, exercise or defend our legal rights.

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 ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

Contact details

If you have any questions about this Privacy Statement or want to exercise your rights as set out in this Privacy Statement, please contact us by sending an email to our Data Protection Officer, Jill Manfrinato at:

Telephone

07342 555351

Email

info@investigateinclusive.com

Last updated