

## DA RESILIENCE LIMITED PRIVACY NOTICE

**Our Intent.** We are committed to safeguarding the privacy of users to our website and the personal data that we hold in general. We will only use the information that we collect about you lawfully and in accordance with the Data Protection Act 2018 (DPA 2018, or the “Act”), which is the applied GDPR (General Data Protection Regulation).

**Data Subject’s.** This Privacy Notice should be read by Data Subjects, i.e. “you,” or any identifiable person using this site and DA Resilience’s services (see below).

**The Data Controller.** This website [www.daresilience.com](http://www.daresilience.com) is owned and operated by DA Resilience Limited. References to “we,” “us,” “our,” or “the website” are references to. We are a company registered in England & Wales (company number 10330403).

**Purpose of Processing Personal Data.** We collect personal data primarily to support business processes. This includes allowing DA Resilience to approach individuals who have contacted us via this website.

**Lawful Basis of Processing Personal Data.** The lawful basis of processing your personal data are as follows:

- **Legitimate Interest.** In the event of a contact request via this website, we shall process your information under Legitimate Interest, you’re your reasonable expectation. The Legitimate Interest Assessment (LIA) for this is:
  - **Purpose Test.** We assess that we are pursuing a legitimate interest of the company to engage with current, past or potential clients to grow our business.
  - **Necessity Test.** To grow our business, we need to hold personal data in order to effectively communicate and to deliver our services.
  - **Balancing Test.** We believe this is a reasonable expectation of a management consultancy business and there is a transparent mechanism for an individual to object (see below).
- **Contract.** If appropriate we may hold personal data under Contract in due course for specific and defined purposes, however we normally rely upon legitimate interest.

**Categories of Personal Data Processed.** The information we hold should be accurate and up to date. The personal information which we may hold will be limited to only what is necessary and will be held securely.

The type or categories of personal data we may collect about you includes your:

- Name;
- Office address;
- Email address;
- Mobile, and, or Landline number; and
- Personal data that is provided as a result of any business communications or delivery of services.

**Transfer of Personal Data Outside the EEA (European Economic Area).**

Personal data will only be transferred outside the EEA or other areas of adequacy determined by the EU, or with your explicit consent.

**Sale or Passing of Personal Data to Third Parties.** We do not collect website information, although our website hosting service (GoDaddy Go Central Web Builder) may do so for security and service purposes. We will not sell or pass your personal data to any company.

**Retention of Personal Data.** We will retain your personal data as follows:

- **Information Held Under Legitimate Interest.** For 12 months after the completion of any service or communications; although email communications will be held for no less than 7 years.
- **Information Held Under Contract.** Not less than 6 years after the end of the financial year to which they relate or as determined by HMRC for tax purposes.

**Data Subject's Rights.** Under the Act you have a number of Rights which we have outlined below:

- **Right of Access.** You are entitled to access your personal data so that you are aware of and can verify the lawfulness of the processing. This is achieved through the mechanism of Subject Access Rights (SAR) and you have the right to obtain:
  - Confirmation that your data is being processed;
  - Access to your personal data (a copy); and
  - Other supplementary information, which corresponds to the information in this privacy notice.

**Fees and Timings.** This information will be provided without charge; without delay and within one month. If an extension is required or requests are considered manifestly unfounded or excessive, in particular because they are repetitive, DA Resilience may choose to: charge a reasonable fee taking into account the administrative costs of providing the information; or refuse to respond. The reasons for this will be formally notified to you and your rights to appeal to the appropriate Supervisory Authority, i.e. UK Information Commissioner's Office (ICO) will be highlighted.

**Identify Verification.** To protect your personal data, DA Resilience will seek to verify your identity before releasing any information, which will normally be in electronic format.

- **Right of Rectification.** You are entitled to have personal data rectified if it is inaccurate or incomplete. DA Resilience will respond within one month of your request. In the unlikely event DA Resilience does not take action to the request for rectification, DA Resilience will inform you of your rights to complain or seek judicial remedy.
- **Right of Erasure.** You may request the deletion or removal of personal data where there is no compelling reason for its continued processing. The Right to Erasure does not provide an absolute '*right to be forgotten*,' especially once the processing is based upon a contract. However, you do have a right to

have personal data erased and to prevent processing in specific circumstances:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed;
  - When you withdraw consent (and this is the basis of processing);
  - When you object to the processing and there is no overriding legitimate interest for continuing the processing;
  - The personal data was unlawfully processed;
  - The personal data has to be erased in order to comply with a legal obligation; and
  - The personal data is processed in relation to the offer of information society services to a child, which DA Resilience does not provide.
- **Right to Restrict Processing.** Under the Act, you have a right to ‘*block*’ or suppress processing of personal data. When processing is restricted, DA Resilience is permitted to store the personal data, but not further process it. In this event exactly what is held and why will be explained to you.
  - **Right to Data Portability.** You may request to obtain and reuse your personal data for your own purposes across different services. This allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability. The Right to Data Portability only applies:
    - To personal data you have provided to DA Resilience;
    - Where the processing is based on your consent or for the performance of a contract; and
    - When processing is carried out by automated means, which DA Resilience does not use.

In these circumstances DA Resilience will provide a copy of your data, normally in the form of a vcf if contact information free of charge, without undue delay and within one month. If there is a delay to this, you will be informed.

- **Right to Object.** You have the right to object to:
  - Processing based on legitimate interests; and
  - Processing for purposes of scientific/historical research and statistics. DA Resilience do not participate in any of these activities.
- **Automated Decision Making and Profiling.** DA Resilience does not employ any automated decision-making or conduct profiling of Data Subjects.

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**Supervisory Authority.** DA Resilience Limited is a registered data processor with the UK’s Information Commissioner’s Office (ICO). Our ICO reference number is ZA378755. The ICO may be contacted via the website at: <https://ico.org.uk> or by telephoning 0303 123 1113