

# Privacy Policy

## Introduction

Capital Lead Solutions Limited. (Registered office address: Unit 1 Old Station Yard, Station Road, Petworth, GU28 0JF, Company Number 14376907, ICO Registration Number: ZB398242) are committed to protecting your privacy in accordance with all relevant sections of the General Data Protection Regulation (“GDPR”) 2018.

This Privacy Policy advises you how Capital Lead Solutions Ltd. (“Us/We”) collect, utilise, share, store and protect (“process”) the personal information (“information”) we come into contact with.

By providing us with your information, or by using our websites, you are confirming that you accept the practices outlined in this Privacy Policy.

We reserve the right to make changes to this Privacy Policy at any time and we recommend that you review it regularly to ensure that you are aware of any changes and how your information may be used.

For the purposes of the Data Protection Act 1998, Capital Lead Solutions Limited is the Data Controller (i.e. the company who is responsible for and controls the processing of your personal data) of the information that you supply. This information may be shared with a third party who will act as a Data Processor to carry out a specified function on behalf of Capital Lead Solutions Limited.

Should you have any requests concerning your personal information, or any queries regarding this Privacy Policy, please write to us at our registered office address or email us at [dpo@capitallead.solutions](mailto:dpo@capitallead.solutions)

It is our commitment to always handle your personal data fairly and legally.

## Information we collect from you

We collect personal information from visitors to [capitallead.solutions](http://capitallead.solutions) (“our site”) using enquiry forms, when you e-mail us your details or when you contact us by telephone. By providing us with this information you agree to us using the information to contact you. If you wish us to stop contacting you, you may email us at [info@capitallead.solutions](mailto:info@capitallead.solutions), write to our registered office address or contact us by telephone on 0208 1911861.

We may receive information about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this site. We also work closely with third parties (including, for example: business partners, advertising networks, analytics providers, search information providers, credit reference agencies sub-contractors used for delivery of services) and may receive information about you from them.

## How we use Your Data

We use your personal data:

- To connect you with relevant service providers as well as to obtain your customer feedback on our performance.
- To verify your identity.
- For marketing communications. We may use your personal data for electronic and telephone marketing purpose (with your consent) to inform you of the latest promotions and products available.

You can opt out at any time from the above marketing communication by e-mailing your request to [info@capitallead.solutions](mailto:info@capitallead.solutions) confirming your full details and your desire to opt out; our records will be amended accordingly.

## Legal Grounds

Under the GDPR, controllers must have a valid lawful basis for each processing activity that they undertake. This section sets out our lawful basis for each activity.

- We have your consent to connect you with relevant Service Providers (known as “Consent” under the GDPR). You have the right to withdraw your consent.

- We may use and share your IP address (this is a “Legitimate Interest” under the GDPR). You have the right to object to processing based on legitimate interests.
- We may receive data from Service Providers (this is a “Legitimate Interest” under the GDPR). You have the right to object to processing based on legitimate interests.

Under the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR), we may contact you based on existing customer (soft opt-in) exemption.

## Cookies

Cookies are small text files that are placed on your computer by websites that you visit. They enable the site's or service provider's system to recognise your browser and capture and remember certain information. Cookies are also used to help us understand your preferences based on previous or current site activity. This enables us to provide you with improved services.

We use cookies to:

- Understand and save user's preferences for future visits.
- Keep track of advertisements.
- To provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we may contact you with information about goods and services similar to those which you have previously shown an interest in.
- Compile aggregate data about site traffic and site interactions to offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. This can be done through your browser settings. Since each browser is different, consult your browser's Help Menu to learn the correct way to modify your cookies.

If you turn cookies off, some of the features that make your site experience more efficient may not function properly. It won't affect the user's experience that make your site experience more efficient and may not function properly.

We may use Google AdSense Advertising. Google, as a third-party vendor, uses cookies to serve ads on our site. Google's use of the DART cookie enables it to serve ads to our users based on previous visits to our site and other sites on the Internet. Users may opt-out of the use of the DART cookie by visiting the Google Ad and Content Network privacy policy.

We, along with third-party vendors such as Google use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the Double Click cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions.

Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add on.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org)

## Storing your personal data

We strive to take all reasonable steps to protect your personal information. All our employees and processors with access to personal data and involved in its processing are obliged to respect its confidentiality. All personal data collected by us is stored on a secure, 256 Bit SSL server. Third parties do not have access to this stored information. The secure server software encrypts all information you input before it is sent to us.

We will only disclose personal information to suppliers we engage to process data on our behalf and affiliated clients of Capital Lead Solutions Limited and as required by law.

## Your Rights under GDPR

Under the GDPR, you have a number of rights:

**The right to be informed.** You have the right to be informed about the collection and use of your personal data, our purposes for processing your personal data, your retention periods for that personal data, and who it will be shared with.

**The right of access.** You have the right to access and receive a copy of your personal data, and other supplementary information. This is known as a subject access request or 'SAR'. This request can be made verbally or in writing.

**The right to rectification.** You are entitled to have personal data rectified if it is inaccurate or incomplete. This request can be made verbally or in writing.

**The right to erasure.** Also known as 'the right to be forgotten'. You may request the deletion or removal of personal data where there is no compelling or legal reason for its continued processing. This request can be made verbally or in writing.

**The right to restrict processing.** You have a right to 'block' or suppress processing of your personal data. When processing is restricted, we are permitted to store the personal data, but not further process it. We can retain just enough information about you to ensure that the restriction is respected in future.

**The right to data portability.** You have a right to receive any personal information that we hold about you in a structured, commonly used and machine-readable format.

**The right to object.** In certain circumstances, you have the right to object to our processing of your personal information. For example, if we are processing your information on the basis of our legitimate interests, and there are no compelling legitimate grounds for our processing which override your rights and interests. This request can be made verbally or in writing.

Whilst there is normally no charge for exercising any of your rights, in exceptional circumstances, your request may be subject to a fee of £10.

## Complaints

Capital Lead Solutions Limited take every complaint seriously and aim to resolve them in the quickest time frame possible. You may contact us by post, email or telephone.

1. Your complaint will be acknowledged by our team within 3 working days. The acknowledgement may include a request for further details about your complaint.
2. We will always investigate your complaint. In order to handle your complaint as quickly as possible, we may contact you if we require additional information.
3. We will analyse the facts and come to a conclusion that takes full account of these. If we are unable to give a response within 28 days from receipt of your complaint, we will write to you in order to keep you informed stating the reasons for the delay, and a proposed date by which we will respond to you.
4. Our team will write to you with a full account of our investigation and of our decision. Following the completion of our investigation, you will be given a period of 4 weeks to respond to our final response. After this period your complaint will be considered resolved if we hear nothing from you.

Our lead supervisory authority for the processing set out in this notice is the UK Information Commissioner's Office (ICO). If you are unhappy with how we have processed your data, you have the right to make a complaint to the ICO.

Last review: 23<sup>rd</sup> November 2022