

Sense HR Limited

# PRIVACY POLICY

March 2023

**Sense HR Ltd** respects your privacy and is committed to protecting your personal data. This privacy statement will inform you as to how we look after your personal data that you provide to us when you enter into a service agreement with us.

**Sense HR Ltd** is the data controller and responsible for your personal data (collectively referred to as the "Company" "we", "us" or "our") in this privacy statement.

**Sense HR Ltd** is an independent HR consultancy in England (referred to as "us" in this policy). You can get in touch with us in any of the following ways:

By email: [office@sensehr.co.uk](mailto:office@sensehr.co.uk)

By phone: 0333 339 0927

Through this website: [www.sensehr.co.uk](http://www.sensehr.co.uk)

## About this privacy policy

This policy sets out how we will use and share the information that you give us. This privacy policy relates to personal data collected by us via:

- Our website
- Email correspondence
- Telephone calls
- Paper communications
- Social media
- Visiting your offices
- Enquiring about, or buying products or services from us
- Providing products or services to us
- From publicly available sources either on or offline

## The Data We Collect About You

When you do business with us or contact us in any of the ways listed above, we may collect some or all of the following personal information from you: your name, title, postal address and contact details, including email address and telephone number; any information relevant to the matter, upon which we are being asked to provide guidance, support or training as part of our agreement with you.

This may sometimes include particularly sensitive personal data for example relating to health conditions, remuneration packages, personal performance indicators, disability or protected characteristics as defined in the Equal Opportunities Act 2010.

When you do business with us as a service provider, we collect some or all of the following personal information from you:

- your name, title and business contact information including addresses, telephone numbers and email addresses;

- details relating to the performance of the contract between us, including financial information and bank details for payment.
- Information generated by visiting our website or engaging with us on social media:
- IP addresses, social handles or usernames

Where we need to collect data by law, or under the terms of a contract we have with a client and a client fails to provide that data when requested then we may not be able to perform the contract we have or are trying to enter into with a client. In this case, we may have to cancel a product or service provided to a client, but we will notify them if this is the case at the time.

## How We Use Your Personal Data

We will only use data clients have provided to us when the law allows us to. Most commonly, we will use client data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with a client.
- Where it is necessary for our legitimate interests (or those of a third party) and a client's interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation. Generally, we do not rely on consent as a legal basis for processing client personal data although we will always aim to get consent.

If you are using the **Sense HR Ltd** HR System, please click [here](#) for information about security and reliability.

## Purposes for which we will use client data

We have set out below, a description of all the ways we plan to use client personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process client personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process client personal data where more than one ground has been set out below.

### Purpose/Activity

- To register a client and set up their account
- Type of Data
- Identity
- Contact
- Lawful basis for processing
- Performance of a contract

Purpose / Activity	Type of Data	Lawful basis for processing
To process and carry out the delivery of services to clients under contract	Identity Contact	Performance of a contract

To manage payments, fees and charges	Contact Financial Transaction	Performance of a contract Legal obligation Legitimate interests
To ensure administration of our contractual services to clients, effective monitoring of the service provided and maintaining up to date records	Contact Identity Usage	Performance of a contract Legitimate interests
To make suggestions and recommendations to you about services that may be of interest	Contact Usage Marketing and Communications	Legitimate interests (to develop services and grow our business)

## Disclosures of Client Personal Data

We will not share your personal data unless:

- we are required by law for example with HM Revenue and Customs and other authorities based in the UK;
- we have a legitimate reason to share with professional advisers for example with accountants, insurers or IT support in the proper performance of their contract with us;
- we have your express consent, for example to take additional advice from suppliers of employment legal services or to act on your behalf in line with our agreement to deliver the services you require.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law and only process your personal data for the specified purposes and in accordance with instructions and their duty of confidentiality.

## Data Security

Unfortunately, the transmission of data over the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee its security. Once we have received your data we will use strict security measures to try to protect it against loss, misuse, or unauthorised alterations.

## Data Retention

We will keep the personal data during any ongoing agreement with you and for 6 years thereafter for the legal and legitimate reasons of retaining identity, contact, business and financial records of work undertaken by us and in case of any query or claim.

When the purposes for which we have collected the data for have ended we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

## Client Legal Rights

Under the General Data Protection Regulation ("GDPR") and the Data Protection Act 2018 (the '2018 Act') you have a number of rights with regard to your personal data.

You have the right:

- to access and obtain a copy of the information we hold on your on request for which there is no fee. We will aim to respond within one month, unless the request is particularly complex in which case it may take longer and we will keep you informed in this regard. If the request is unfounded, excessive we may refuse to comply with the request or if additional copies are required we may make a reasonable charge;
- to require us to change incorrect or incomplete data; we want to ensure that your personal information is accurate and up to date. If any of the information that you have provided to us changes, for example if you change your email or postal address, please let us know the correct details as soon as possible;
- to require us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- to object to the processing of your data where we are relying on our legitimate interests as the legal ground for processing;
- to obtain and reuse your personal data for their own purposes across different services. This is known as data portability

If you have concerns that you would like to raise with us, please contact [office@sensehr.co.uk](mailto:office@sensehr.co.uk). If you have any concerns about our handling of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office ("ICO") by visiting <https://ico.org.uk/concerns/> or by telephoning the ICO helpline on 0303 123 1113.

## Your consent

By submitting your information, you consent to the use of that information as set out in this policy.

## Changes to the Privacy Policy

We keep our Privacy Policy under regular review and any changes will be posted on this page so that you may be aware of the information we collect and how we use it at all times. This privacy policy was last updated in March 2023