



emc – Privacy Policy (May 2018)

Introduction

emc respects the privacy of the people whose personal data we process and we are committed to protecting it. This privacy notice sets out what personal data we use, how we use it, how we look after it and what rights you have. It applies to information we collect in relation to:

- Clients and their employees who interact with us;
- Users of our website;
- People who attend our meetings and events, and/or those we run on behalf of our clients;
- People who contact or interact with us via any medium (by post, email, telephone or social media).

It is important that you read this notice, which is provided pursuant to the General Data Protection Regulation and the Data Protection Act 2018) together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information. This privacy notice supplements the other notices and is not intended to override them.

1. Important information

Contact information

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact Tina Cook using the details set out below:

Email address: info@ethical-management-consulting.co.uk

Postal address: 8 Maycroft Avenue, Poulton-le-Fylde, Lancashire FY6 7NE

Telephone number: 0844 884 2287

Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

We reserve the right to update this privacy notice at any time.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our website includes links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect and use the following types of data about you:

- Name, username or similar identifier, title, job title and gender.
- Billing address, delivery address, email address and telephone numbers.
- Photos or videos of you.
- Details of your business interests.
- Internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- Information about how you use our website.
- Details about your preferences for your preferences in receiving information from us and your communication preferences.

We do not collect or process any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) but will update this privacy notice and notify you if this changes.

If you fail to provide personal data

There is no requirement on you to provide us with any personal data; however, if you fail to do so other members and potential business contacts will not be able to find your contact details on our website, promotional material created by us or by asking us for it.

3. How is your personal data collected?

We use different methods to collect personal data from and about you including:

- Direct interactions. You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - Contract with us as a client;
 - Provide details to us at meetings or events;
 - Request information to be sent to you; or
 - Interact with us about business activities or events.
- Automated technologies or interactions. As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- Third parties or publicly available sources. We may receive personal data about you from various third parties as set out below:
 - From your employer;
 - From an event organiser or our client;
 - Technical data from search engines and analytics providers;
 - Details from publicly available sources.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party), by which we mean in the interest of emc's business or third party project partner in conducting and managing our/their business. We have assessed the potential impact on individuals (both positive and negative) and do not consider that the legitimate interests of emc are overridden by any potential impact on you.

Our legitimate interests are as follows;

- Carrying out contracted business projects;
- Advising, assisting and supporting client organisations and/or individuals;
- Managing personal coaching information;
- Identifying and providing training amongst clients.

Generally we do not rely on consent as a legal basis for processing your personal data. We send relevant information to clients (including their employees) and business colleagues that have requested information. Whilst we don't consider this to be unsolicited direct marketing we will nevertheless stop emailing such information at any time if you ask us to stop.

Purposes for which we will use your personal data

We have set out below the ways we plan to use your personal data:

- Internal record keeping and administration, including in relation to your attendance at meetings, events or training and coaching sessions/workshops.
- Contacting you via any medium in relation to meetings, events or business opportunities.
- Using your images for marketing purposes, with relevant permission.

Cookies

Refer to our website (www.ethical-management-consulting.co.uk) for latest [cookie policy](#).

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may share your personal data with the parties set out below:

- Consultants and subcontractors acting on our behalf.
- Professional advisers including lawyers, accountants, bankers, auditors and insurers.
- Suppliers of goods and services to us.
- Other attendees of an event, meeting or workshop you have registered for.

We do not allow our third-party processors to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We will only transfer your personal data out of the EEA (for example where there is a potential business opportunity for you or the member you represent involving a non-EEA organisation or nation) with your explicit consent. Ordinarily, we will provide you with details of the opportunity so that you can decide whether to supply any personal data yourself.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

You have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with the law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated but comply in any event within 3 months of receiving your request (or any further information requested from you).