

The Engaging People Company Ltd Company Privacy Notice

The Purpose of this privacy notice is to explain how The Engaging People Company processes the personal data it gathers to administer the company. This does not include personal data gathered for consultative purposes, such as surveys, for which a separate notice is made available.

The Role of The Engaging People Company in data protection terms is that of a data controller where it determines the purpose and use of personal data it is processing. It is the responsibility of The Engaging People Company privacy manager contactable using michelle@engaging-people.co.uk to ensure that all processing accords with the latest UK data protection legislation.

The sort of personal data collected by The Engaging People Company will be basic contact details sufficient to be able to respond to general enquiries, to promote and administer the company.

The Engaging People Company's duty of confidentiality means that The Engaging People Company staff will treat your personal data with due respect and in confidence. It is only disclosed to those that need to know it. We expect the same duty of confidentiality from all third parties with whom The Engaging People Company shares personal data. Data processing agreements are put in place when required.

The Engaging People Company processes personal data against a lawful basis and such instances are described below:

- We will pursue our legitimate interests to respond to your general enquiries and stay in touch with you for marketing purposes
- To comply with our legal obligations
- When it is necessary for the performance of a contract and its prior preparation
- When processing for a pre-defined purpose for which your consent will be sought prior to the processing commencing – please note that consent can be withdrawn at any time by contacting the privacy manager

In all cases the processing of personal data by The Engaging People Company shall be done in accordance with the principles of data protection.

The Engaging People Company will share personal data, on a 'need to know' basis with some or all of the following:

- The Inland Revenue (HMRC) for invoice purposes
- Accountants appointed by The Engaging People Company for payment handling and related record keeping
- Unspecified recipients but only when compelled to do so for legal reasons

The Engaging People Company will process your personal data in the UK and the EU and all business data, including email, are backed up using a replicated systems based in the UK and the EU. The Engaging People Company uses appropriate technical and organisational measures to safeguard all personal data.

The Engaging People Company follows a retention schedule to determine the length of time it holds different types of personal data. The retention schedule is shown below:

- Routine correspondence only for casual enquiries will be stored for 3 months
- Correspondence for contract related business in hard copy or in emails will be stored for 2 years
- Contact data is stored indefinitely unless a valid request to erasure is received from the interested data subject
- For former customers, we will retain your details for 7 years after the conclusion of our contractual obligations to you or our last contact with you, whichever is the later
- Invoice related information will be retained for 6 years after the tax year in which they were created
- By exception, documentation that includes personal data may be retained by The Engaging People Company beyond the schedule, but only for a specific purpose and only when The Engaging People Company believes it has a legitimate interest or a legal obligation to do so

At the end of the retention schedule The Engaging People Company will either return, destroy or delete your personal data and any associated emails or relevant documentation. If it is technically impractical to delete electronic copies of personal data, it will put it beyond operational use. It should be noted that The Engaging People Company allows up to one month after the retention schedule to complete the action.

Where The Engaging People Company website uses non-essential cookies, and similar technologies, you will be asked for consent prior to their use.

The UK General Data Protection Regulation defines the rights that you have, although these do not apply in all situations. For convenience, these rights are shown below:

- Right to be informed as to how The Engaging People Company is processing your personal data – this is done through this notice, but specific to client notices may be issued when needed
- Right to access your personal data held by us which is done by making a (Data) Subject Access Request to the privacy manager
- Right to rectification of your personal data if you believe we have collected it incorrectly or it needs to be updated
- Right to erasure of your personal data for which we no longer have a legitimate purpose to process
- Right to restrict processing under certain circumstances, during which time your personal data but will be out of operational use until the related matter is resolved
- Right to data portability of your personal data in a machine-readable version, but this only applies to data that has been provided with consent or under contract
- Right to object to The Engaging People Company processing your personal data for which it does not have a legal or contractual obligation
- Rights related to automated decision making and profiling (although we do not use these techniques in its decision making)

Further details on data subjects' rights can be found on the Information Commissioner's Office (ICO) website: <https://ico.org.uk>.

Raising concerns, exercising rights or making queries about our processing of your personal data can be done by contacting the privacy manager. Be aware that we will need to verify your identity before responding fully. This may involve asking you for documentary proof

that, in context, will enable us to confirm your identity. Alternatively, you may contact the ICO directly without referring to us first, although naturally we would welcome the first opportunity to address your concerns or queries.

April 2023