

Introduction

As an essential part of our business, we collect and manage client and non-client data. In doing so, we observe the UK data protection legislation, and are committed to protecting and respecting clients' and non-client's privacy and rights. Specifically, we act as a "Data Controller" in respect of the information gathered and processed by us. In order that you are reliably informed about how we operate, we have developed this privacy notice (also known as a Fair Processing Notice or FPN), which describes the ways in which we collect, manage, process, store and share information about you as a result of you being our client or visiting this site. The privacy notice also provides you with information about how you can have control over the use of your data.

If you have any comments or queries regarding our use of your data, please contact our Group Data Protection Officer at info@steel-clunis.co.uk.

Alternatively, you can write to our Data Protection Officer at Steel & Clunis, 30 Grove Lane, Handsworth, Birmingham B21 9EP.

What Information Do We Collect About You?

In general terms, we seek to collect information about you so that we can:

- Administer our relationship with you, provide services and respond to enquiries
- Process applications for employment
- Deliver requested information to you about our services and our subsidiaries
- Ensure the billing of any procured services and obtain payment
- Process and respond to any complaints
- Enable us to meet our legal and other regulatory obligations imposed on us
- Audit usage of our websites.

The information that we need for these purposes is known as your "personal data". This includes your name, home address, email address, telephone and other contact numbers and financial information. We collect this in a number of different ways. For example, you may provide this data to us directly online or over the telephone, or when corresponding with us by letter or in person.

We also process sensitive classes of information that includes:

- Physical or mental health details, and
- Racial or ethnic origin.

Please also be advised that when you visit this website, cookies will be used to collect information about you such as your Internet Protocol (IP) address which connects your computer or mobile device to the Internet, and information about your visit such as the pages you viewed or searched for, pages response times, download errors etc. We do this so that we can measure our website's performance and make improvements in the future. Cookies are also used to enhance this website's functionality and personalisation, which includes sharing data with third party organisations. You can

control this by adjusting your cookies settings as described in our Cookie Policy on this website.

How Will We Use The Information?

We use the data collected from you for the specific purposes listed in the table below. Please note that this table also explains:

- The legal basis for processing your data, linked to each processing purpose; and
- In what circumstances your data will be shared with a third party organisation.

Purpose for processing data	Legal basis for processing data	Third party organisations with whom data is shared
To administer our relationship with you, provide services and respond to enquiries.	To meet the requirements of a contract.	None unless you are explicitly notified otherwise.
To ensure the billing of any procured services by you and obtain payment.	To meet the requirements of a contract.	Government VAT and tax inspectors, external auditors, internal auditors.
To provide enquirers support by telephone.	To fulfil contractual obligations this includes taking action before entering into a contract.	None.
To process and respond to complaints.	To meet a legal obligation.	None.
To monitor and record information relating to the use of our services, to include our website.	To meet a legitimate interest in order to improve the services and experience and website for individuals.	Web service providers and cookie providers.
To conduct human resource administration to include assessing suitability, eligibility and/or fitness to work.	To fulfil contractual obligations this includes taking action before entering into a contract.	Professional and Regulatory Bodies.

Your Rights

Under the terms of data protection legislation, you have the following rights as a result of using this website or our services:

Right To Be Informed

This privacy notice fulfils our obligation to tell you about the ways in which we use your information as a result of you using this website.

Right To Access

You have the right to ask us for a copy of any personal data that we hold about you. This is known as a "Subject Access Request". Except in exceptional circumstances (which we

would discuss and agree with you in advance), you can obtain this information at no cost. We will respond to your request within 30 days.

To make Subject Access Request, please write to our **Data Protection Officer at Steel & Clunis, 30 Grove Lane, Handsworth, Birmingham B21 9EP.**

Right To Rectification

If any of the information that we hold about you is inaccurate, you can either:

- Contact us on 0121 523 9191
- Contact our Data Protection Officer at Data Protection Officer at Steel & Clunis, 30 Grove Lane, Handsworth, Birmingham B21 9EP or via email at info@steel-clunis.co.uk

Right To Be Forgotten

From 25 May 2018, you can ask that we erase all personal information that we hold about you. Where it is appropriate that we comply, your request will be fully actioned within 30 days. For further information, please contact 0121 523 9191 or alternatively, please contact our Data Protection Officer at Steel & Clunis, 30 Grove Lane, Handsworth, Birmingham B21 9EP or via email at info@steel-clunis.co.uk

Right To Object

You have the right to object to:

- The continued use of your data for any purpose listed herein for which consent is identified as the lawful basis for processing i.e. you have the right to withdraw your consent at any time.
- The continued use of your data for any purpose listed herein for which the lawful basis of processing is that it has been deemed legitimate.

Right To Restrict Processing

If you wish us to restrict the use of your data because (i) you think it is inaccurate but this will take time to validate, (ii) you believe our data processing is unlawful but you do not want your data erased, (iii) you want us to retain your data in order to establish, exercise or defend a legal claim, or (iv) you wish to object to the processing of your data, but we have yet to determine whether this is appropriate, please contact our Data Protection Officer at Steel & Clunis, 30 Grove Lane, Handsworth, Birmingham B21 9EP or via email at info@steel-clunis.co.uk

Right To Data Portability

If you would like to move, copy or transfer the electronic personal data that we hold about you to another organisation, please contact our Data Protection Officer at Steel & Clunis, 30 Grove Lane, Handsworth, Birmingham B21 9EP or via email at info@steel-clunis.co.uk

Rights Related To Automated Decision-Making

If you would like to object to automated decision making without any individual involvement, and to the profiling of your data, please contact our Data Protection Officer

at Steel & Clunis, 30 Grove Lane, Handsworth, Birmingham B21 9EP or via email at info@steel-clunis.co.uk

Is The Processing Of Information Likely To Cause Individuals To Object Or Complain?

Steel & Clunis is not aware of any justifiable reasons that would constitute a legitimate reason for objecting or complaining about the way we process or control information.

How Long Will We Retain Information For?

Steel & Clunis will typically retain information for a period of seven years. This is due to regulatory reasons and to ensure our business records are adequate to maintain the requisite levels of insurance to protect our clients and non-clients.

Overseas Transfers

None of the information that we collect process or store as a result of this website is transferred outside of the European Economic Area (EEA). This includes information that is exchanged with any third party organisation as described above.

Data Privacy And Security

At Steel & Clunis, we maintain a comprehensive data management work programme, which includes processes for ensuring that data protection is a key consideration of all new and existing IT systems that hold personal data. Where any concerns, risks or issues are identified, we conduct relevant impact assessments in order to determine any actions that are necessary to ensure optimum privacy.

We also maintain an active information security work programme which seeks to protect the availability, confidentiality and integrity of all physical and information assets. Specifically, this helps us to:

- Protect against potential breaches of confidentiality;
- Ensure all IT facilities are protected against damage, loss or misuse;
- Increase awareness and understanding of the requirements of information security, and the responsibility of our colleagues to protect the confidentiality and integrity of the information that they handle; and
- Ensure the optimum security of this website.

General

Questions and comments regarding this Privacy Notice are welcomed, and should be sent to our Data Protection Officer at info@steel-clunis.co.uk

Alternatively, you can write Data Protection Officer at Steel & Clunis, 30 Grove Lane, Handsworth, Birmingham B21 9EP.

You can also contact our Data Protection Officer if you have any concerns or complaints about the ways in which your personal data has been handled as a result of you using this website.

Alternatively, you have the right to lodge a complaint with the Information Commissioner's Office who may be contacted at Wycliffe House, Water Lane, Wilmslow SK9 5AF or <https://ico.org.uk>.