

## **Privacy Policy**

We are The Business Advice Consultancy Limited (“we”, “us”, “our”), trading as BAC, registered in England with Company Number 12644580. Our registered office address is at Morgan Reach House, 136 Hagley Road, Birmingham, West Midlands, B16 9NX.

We are a business management provider that provides businesses with access to business management business services.

Our website is [www.businessadviceconsultancy.co.uk](http://www.businessadviceconsultancy.co.uk) (“Our site”).

If you need to contact us in relation to these Terms and Conditions, you can do so by letter addressed to the Managing Director at the above address, or by email to [fred.dures@businessadviceconsultancy.co.uk](mailto:fred.dures@businessadviceconsultancy.co.uk)

### **1. ABOUT THIS POLICY**

1.1 We understand that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits our website and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1.2 Please read this Policy carefully and ensure that you understand it. Your acceptance of it is required and will be confirmed by you if you continue to use our website.

1.3 If you do not agree to this Policy, you must immediately cease using our site.

### **1.4 DEFINITIONS AND INTERPRETATION**

In this Policy the following words shall have the following meanings:

“Account” means an account required to access and/or use certain areas and features of our website;

“Cookie” means a small text file placed on your computer or device by our website when you visit certain parts of it and/or when you use certain features of it. Details of the Cookies used by our website are set out in our Cookies Policy;

“Cookie Law” means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations as amended and the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) General Data Protection Regulation as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 (“UK GDPR”) and any successor legislation;

“Data Protection Legislation” means all legislation and regulations in force from time to time regulating the use of personal data and the privacy of electronic communications including, but not limited to, the UK GDPR, the Data Protection Act 2018, the Privacy and Electronic Communications Regulations as amended, and any successor legislation

### **2. WHAT DOES THIS POLICY COVER?**

This explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

### **3. WHAT IS PERSONAL DATA?**

3.1 Personal data is defined by the Data Protection Legislation as ‘any information relating to an identifiable person who can be directly or indirectly identified by reference to an identifier’.

3.2 Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

3.3 The personal data that we collect is set out in Part 5, below.

## 4. WHAT ARE MY RIGHTS?

4.1 Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 13.
- b) The right to access the personal data we hold about you. Part 12 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us me using the details in Part 13 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 13 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. Part 6 explains more about how we use your personal data, including automated decision-making profiling.

4.2 For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 13.

4.3 It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed if we have that data.

4.4 Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

4.5 If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 11.

## 5. WHAT PERSONAL DATA DO YOU COLLECT AND HOW?

5.1 Depending upon your use of our services we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. We do not collect any 'special category' or 'sensitive' personal data or personal data relating to children or criminal convictions and/or offences.

<b>Data Collected</b>	<b>How We Collect the Data</b>
Identity Information including name, title, date of birth and gender.	If you complete a contact form in our website.
Contact information including address, email and telephone number.	If you complete a contact form in our website.
Business information including business name, job title, industry.	If you complete a contact form in our website.

**Data Collected****How We Collect the Data**

Technical information including IP address, browser type and version and operating system.	By typical use of our website.
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**6. HOW DO YOU USE MY PERSONAL DATA?**

6.1 The Data Protection Legislation requires us to have a lawful basis for using personal data. We describe below how we may use your personal data and what our lawful bases is for doing so:

**What We Do****What Data We Use**

Administering our business and/or in relation to our services to you	All the above.
Supplying our services to You	All the above.
Managing payments in relation to services made available and/or delivered to you	All the above.
Customising and adapting our services for you.	All the above.
Contacting and communicating with you	All the above.
Providing information to you by email and post that you have opted-in-to receiving	All the above.

6.2 We may also use your personal data for marketing purposes provided that you have provided your permission for us to do so and/or where this is permitted by law. Such marketing may include contacting you by email, telephone, text message or post with information, news, and offers in relation to our services. This will not include, and we will not send to you any unlawful marketing or spam and you will always have the opportunity to opt-out of receiving such communications. We are required to and will obtain your express opt-in consent before we share your personal data with any third parties for marketing purposes. You can opt-out and withdraw such consent at any time.

6.3 Please Note Any Third-Party website whose content appears on our website may use third-party Cookies, as detailed in Our Cookies Policy and you should refer to that Policy for more information on controlling cookies. We do not control the activities of such third parties. We do not control the data that such third parties collect and/or use themselves. We advise you to check the privacy policies of any such third parties to understand how data may be dealt with by them.

6.4 We do not use any automated systems for conducting any form of decision-making and/or profiling.

6.5 We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 13.

6.6 If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so or seek your consent to such processing.

6.7 In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## 7. HOW LONG WILL YOU KEEP MY PERSONAL DATA?

7.1 We will not keep your personal data for any longer than is necessary considering the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Identity Information that might include name, title, date of birth and gender.	Throughout the time that we provide our services to you and no longer than three months after save for or as required pursuant to law.
Contact information including address, email and telephone number.	Throughout the time that we provide our services to you and no longer than three months after save for or as required pursuant to law.
Business information including business name, job title, industry.	Throughout the time that we provide our services to you and no longer than three months after save for or as required pursuant to law.
Technical information including IP address, browser type and version and operating system.	Until you clear your browser Cookies.

## 8. HOW AND WHERE DO YOU STORE OR TRANSFER MY PERSONAL DATA?

8.1 We may store or transfer some or all of your personal data in countries that are outside of the UK. These are known as “third countries”. We will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK under the Data Protection Legislation as follows:

8.2 We will only store or transfer personal data in or to countries that are deemed to provide an adequate level of protection for personal data. For further information about adequacy decisions and adequacy regulations, please refer to the Information Commissioner's Office.

8.3 The security of your personal data is essential to us, and to protect your data, we take important measures, including the following:

- a) limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality; and
- b) procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

## **9. DO YOU SHARE MY PERSONAL DATA?**

9.1 We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

- a) If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Policy.
- b) In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we participate in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.
- c) We may share your personal data with third party companies for the providing of our services to you.

9.2 If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

9.3 If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 8.

9.4 If selling, transferring, or merging parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Policy.

9.5 In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## **10. HOW CAN I CONTROL MY PERSONAL DATA?**

10.1 In addition to your rights under the Data Protection Legislation, set out in Part 4, when you submit personal data via our website, you may be given options to restrict our use of your personal data. We aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and

10.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("TPS"), the Corporate Telephone Preference Service ("CTPS"), and the Mailing Preference Service ("MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## **11. CAN I WITHHOLD INFORMATION?**

You may access certain areas of our website without providing any personal data at all. However, to use all features and functions available on our website you may be required to submit or allow for the collection of certain data. You may restrict our use of Cookies. For more information, see our Cookie Policy.

## **12. HOW CAN I ACCESS MY PERSONAL DATA?**

12.1 If you want to know what personal data, we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a subject access request ("SAR").

12.2 All SAR's should be made in writing and sent to the email or postal addresses shown above. To make this as easy as possible for you, a SAR Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your SAR, as quickly as possible.

12.3 There is not normally any charge for a SAR. If your SAR is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

12.4 We will respond to your SAR within a month and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your SAR is more complex, more time may be required up to a maximum of three months from the date we receive your SAR. You will be kept fully informed of our progress.

## **13. CHANGES TO THIS POLICY**

13.1 We may change this Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects it.

13.2 Any changes will be made available on our website.