

PRIVACY NOTICE FOR CONTACTS

Date: 25th April 2018

What is the purpose of this document?

CAG Consult LLP (trading as **CAG Consultants**), a limited liability partnership registered in England under number OC374324, whose registered office is at 8 Blackstock Mews, London, N4 2BT, is committed to protecting the privacy and security of the personal information of the people (**Data Subjects**) we deal with in the course of:

1. Fulfilling a contract for a client
2. raising awareness about, and then holding or participating in, the events or activities that we (or others) may hold or undertake;
3. raising awareness about, promoting or providing the services that we (or others) may provide;
4. or providing information, insights and updates that we (or others) may publish (together called **our Activities**).

This privacy notice describes how we collect and use personal information about Data Subjects before, during and after we undertake our Activities in accordance with the General Data Protection Regulation (**GDPR**) and relevant regulations (including the Privacy and Electronic Communications Regulations (**PECR**)). It applies to all Data Subjects (whether current or former).

CAG Consultants is a "data controller". This means that we are responsible for deciding how we hold and use the personal information of Data Subjects. We are required to provide the information contained in this privacy notice to those Data Subjects. We may, on occasion, also be a "data processor". This means that it obtains information from a third party, and processes it on behalf of that third party. For example, we may receive personal information from a third party with which we have a contract requiring us to, among other things, make contact the data subjects the personal information relates to. Where we are a data processor, we will process personal data only in accordance with the written instructions of the data controller, and as permitted by GDPR and relevant regulations.

This notice does not form part of any contract to undertake our Activities. We may update this notice at any time.

It is important that Data Subjects read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about Data Subjects, so that they are aware of how and why we are using such information.

Data protection manager

We have appointed a data protection manager (**DPM**) to oversee compliance with this privacy notice and the processing by us of personal information about Data Subjects. If you have any questions about this privacy notice or how we handle the personal information referred to in it, please contact our DPM (via hq@cagconsult.co.uk). If you have any complaints about the

processing of the personal information referred to in this privacy notice, you have the right to make a complaint to the Information Commissioner's Office (ICO) (www.ico.org.uk).

Data protection principles

We will comply with data protection law. This says that the personal information we hold about Data Subjects must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to them and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told them about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told them about.
6. Kept securely.

The kind of information we hold about Data Subjects

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).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We may collect, store, and use the following categories of personal information about Data Subjects in the course of undertaking our Activities:

1. Personal contact details such as name, title, addresses, telephone numbers and email addresses.
2. The organisation they work for, or represent
3. Views provided during interviews, focus groups, workshops, surveys or otherwise.

We may also collect, store and use the following "special categories" of more sensitive personal information about Data Subjects:

1. Information about race or ethnicity, religious or philosophical beliefs, sexual orientation, trade union membership and political opinions (for example if this information is provided by a data subject during an interview).
2. Information about physical and/or mental health (including information about disabilities and access and dietary requirements which we need to cater for at events).

How is personal information about Data Subjects collected?

We typically collect personal information about Data Subjects either from the Data Subject or from third parties, such as organisations he or she works for, or which work in the same sector, or which provide services or support to those Data Subjects. Sometimes a client we are working for, such as a government department, might provide personal information to us.

We may collect additional personal information about Data Subjects in the course of undertaking our Activities. For example, we may gather personal views from Data Subjects, or information, including special category information, about health, income or other characteristics.

How we will use information about Data Subjects

We will only use personal information about Data Subjects when the law allows us to do so. Most commonly, we will use personal information about Data Subjects in the following circumstances:

1. Where we have obtained the Data Subject's freely given, specific, informed and unambiguous consent by way of a statement or clear affirmative action.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and the interests and fundamental rights of the Data Subject do not override those interests.

Situations in which we will use personal information about Data Subjects

We process the categories of information in the list above (under the heading *The kind of information we hold about Data Subjects*) as follows:

1. Where we have received the freely given, specific, informed and unambiguous consent to do so by the Data Subject, in respect of these Activities:
 - sending communications about our Activities to Data Subjects in line with their requests and preferences,
 - obtaining dietary and other special requirements relating to a Data Subject's health in connection with the events or activities that we (or others) may hold or undertake, and sharing this information, where necessary, in order to ensure that any such requirements are accommodated and catered for, and
 - administering and sending information by post, where this is the only or most appropriate way of contacting a data subject, or transmitting information.
2. Where we are processing the information to pursue legitimate interests of our own or those of third parties, provided the interests and fundamental rights of the Data Subject do not override those interests:
 - undertaking research and other activities in pursuance of a contract with a third party,
 - sharing information with third party hosts or organisers of events that we may hold or participate in. We will only do so if we have notified you in advance of the identity of any such host or organiser,
 - undertaking internal quality control of our Activities. This will include processing opinions and feedback relating to our Activities and maintaining records relating to the same,
 - administering and managing the events that we hold, the activities that we undertake and the information, insights and updates that we publish. This

will include processing personal information in booking and mailing list sign-up forms,

- ensuring that we hold accurate contact and other information about Data Subjects through centralised and secure databases and filing systems, and
- processing enquiries and requests for our services, and reviewing, considering and responding to those enquiries and requests.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of personal information about Data Subjects.

We will only process "special categories" of personal information in accordance with the paragraph below headed *How we use particularly sensitive information*.

Change of purpose

We will only use personal information about Data Subjects 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 the personal information of Data Subjects for an unrelated purpose, we will tell them about the legal basis which allows us to do so.

How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information.

We may process special categories of personal information about Data Subjects with the explicit written consent of the Data Subject.

Less commonly, we may process this type of information where the Data Subject has already made the information public, and the processing is undertaken in line with our Data Protection Policy.

Do we need Data Subjects' consent?

We may approach Data Subjects for their explicit written consent to allow us to use their personal information for raising awareness about, or promoting, our Activities (known as direct marketing). If we do so, we will provide them with full details of the information that we would like and the reason(s) we need it, so that they can carefully consider whether they wish to consent.

Data sharing

In order to undertake our Activities, we may have to share personal information about Data Subjects with third parties, including third-party service providers.

We require third parties to respect the security of personal information about Data Subjects and to treat it in accordance with the law.

We may transfer personal information about Data Subjects outside the EU. If we do, Data Subjects can expect a similar degree of protection in respect of their personal information.

We do not sell personal information about Data Subjects to any third party.

Why might we share personal information about Data Subjects with third parties?

We may share personal information about Data Subjects with third parties where required by law, or where we have another legitimate interest in doing so, for example, storing it securely on a third party server.

Which third-party service providers process personal information about Data Subjects?

The following activities are carried out by third-party service providers:

1. email marketing services, including our e-newsletter
2. electronic survey service providers
3. off-site archiving and storage facilities;
4. IT (including back-up) services; and

How secure is personal information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect personal information about Data Subjects in line with the law. We do not allow our third-party service providers to use the personal data of Data Subjects for their own purposes. We only permit them to process such personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share personal information about Data Subjects with other third parties. For example, we sometimes use sub-contractors to help us deliver a contract. Where we do this, we require the subcontractors to meet data protection requirements, and only process data in the ways described in our privacy notice.

Transferring information outside the EU

We use some processors whose servers and offices are located in the USA, so the personal information about Data Subjects may be transferred to, stored, or processed in the USA.

Those processors take steps to protect the privacy of Data Subjects. They participate in, and have certified their compliance with, the EU-U.S. Privacy Shield Framework. They are committed to subjecting all personal information about Data Subjects received from European Union member countries in reliance on the Privacy Shield Framework, to the Framework's applicable principles.

The measures taken by those processors ensure that the personal information of Data Subjects is treated in a way that is consistent with, and which respects, the EU and UK laws on data protection.

The processors are:

- MailChimp, operated by Rocket Science Group, which we use to help us administer our online survey and e-marketing activities. For further information, please see MailChimp's privacy notice which can be found here: www.mailchimp.com/legal/privacy.
- Eventbrite, operated by Eventbrite, Inc., which we use to take and process booking information. For further information, please see Eventbrite privacy notice which can be found [here](#).
- SurveyMonkey, operated by SurveyMonkey Inc. And SurveyMonkey Europe UC, which we use for online surveys and similar purposes. For further information, please see SurveyMonkey's privacy notice which can be found [here](#).

We use third parties to store personal data. To protect the security of our data, we do not name the providers of such services to us in this privacy notice. However, a list of our service providers is available from our DPM on written request. We reserve the right to withhold details of our service providers if we think such request might prejudice the security of our data.

Data security

We have put in place measures to protect the security of personal information about Data Subjects. Details of these measures are available upon request.

Third-party service providers will only process personal information about Data Subjects on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent personal information about Data Subjects from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to personal information about Data Subjects to those partners, employees, agents, contractors and other third-party service providers who need to know. Third-party service providers will only process personal information about Data Subjects on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify a Data Subject, the ICO and any other applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will we use information for?

We will only retain personal information about Data Subjects 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. Details of retention periods for different aspects of personal

information about Data Subjects are available in our Data Retention and Destruction Policy which is available from our DPM. 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 the personal data, the purposes for which we process the personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise or pseudonymise personal information about Data Subjects so that it can no longer be associated with them, in which case we may use such information without further notice to them. Once a person has ceased to be a Data Subject (because, for example, he or she has removed himself or herself from our mailing lists) we will retain and securely destroy his or her personal information in accordance with our Data Retention and Destruction Policy.

Data Subjects' duty to inform us of changes

It is important that the personal information we hold about Data Subjects is accurate and current. We ask that Data Subjects keep us informed if their personal information changes during the course of our undertaking of our Activities.

Data Subjects' rights in connection with personal information

Under certain circumstances, a Data Subject has the right to:

1. *Request access* to his or her personal information (commonly known as a "data subject access request"). This enables him or her to receive a copy of the personal information we hold about him or her and to check that we are lawfully processing it.
2. *Request correction* of the personal information that we hold about him or her. This enables him or her to have any incomplete or inaccurate information we hold about him or her corrected.
3. *Request the erasure* of his /her personal information. This enables him or her to ask us to delete or remove personal information where there is no good reason for us continuing to process it.
4. *Object to processing* of his or her personal information where we are relying on a legitimate interest (or that of a third party) and there is something about his or her particular situation which makes him or her want to object to processing on this ground. A Data Subject also has the right to object where we are processing his or her personal information for direct marketing purposes.
5. *Request the restriction of processing* of his or her personal information. This enables him or her to ask us to suspend the processing of personal information about him or her, for example if he or she wants us to establish its accuracy or the reason for processing it.
6. *Request the transfer* of his or her personal information to another party.

If a Data Subject wants to review, verify, correct or request erasure of his or her personal information, object to the processing of his or her personal data, or request that we transfer a copy of his or her personal information to another party, he or she should contact our DPM in writing.

No fee usually required

Data Subjects will not normally have to pay a fee to access their personal information (or to exercise any of the other rights). We may charge a reasonable fee, however, if their request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from Data Subjects

We may need to request specific information from Data Subjects to help us confirm their identity and ensure their right to access the information (or to exercise any of their other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

Where a Data Subject may have provided his or her consent to the collection, processing and transfer of his or her personal information for a specific purpose, he or she has the right to withdraw his or her consent for that specific processing at any time. To withdraw consent, a Data Subject should contact our DPM (see below). Once we have received notification that a Data Subject has withdrawn his or her consent, we will no longer process his or her information for the purpose or purposes originally agreed to, unless we have another legitimate basis for doing so in law.

Changes to this privacy notice

We review this privacy notice annually and reserve the right to update it at any time, and we will make a new privacy notice available to Data Subjects when we make any substantial updates. We may also tell Data Subjects in other ways from time to time about the processing of their personal information.

If you have any questions about this privacy notice, please contact our Data Protection Manager, via email at hq@cagconsult.co.uk, or post to CAG Consultants, Gordon House, 150 Minories, London, EC3N 1LS.