PRIVACY NOTICE FOR CONTACTS

Date: 24th June 2025

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:

- Responding to queries about our business and services that we receive via this website or directly by phone, email or letter:
- Delivering our services;
- Raising awareness about our services, including the publication of information, insights and updates and the events or activities that we may hold.
- Improving our services.

Together the above are **our purposes**.

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 United Kingdom General Data Protection Regulation (UK **GDPR**), the Data Protection Act 2018 and other relevant regulations (including the Privacy and Electronic Communications Regulations (**PECR**)). It applies to everyone about whom we hold personal information.

CAG Consultants is typically a "data processor". This means that we usually obtain information from a third party, and process 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 with 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 the UK GDPR and relevant regulations. This privacy notice does not cover these processing activities, as they are typically covered by contract-specific privacy notices prepared by the relevant data controller.

However, CAG Consultants may, on occasion, also be 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. This notice relates to these Data Subjects and 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 on behalf of a third party, 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 https://newcommons.org/newcommons.org/newcommons.org/ about the processing of the personal information referred to in this privacy notice, please contact us in the first instance. If you are dissatisfied with how we deal with your complaint you have the right to make a complaint to the Information Commissioner's Office (**ICO**) (www.ico.org.uk).

The kind of information we hold about Data Subjects

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.

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 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 from our clients, but they may also be supplied to us by third parties, such as the organisations they work for, or which work in the same sector, or which provide services or support to those data subjects. We may also collect personal data directly from those involved in our research.

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 legitimise the use of your personal data

We can only use personal information about Data Subjects where we have a lawful basis to do so. Most commonly, we will the following lawful bases for processing ordinary personal data:

- 1. The data subject has given consent to the processing;
- 2. The processing is necessary for the performance of a contract to which the data subject is a party, or for the taking of steps at the request of the data subject with a view to entering into a contract:
- 3. The processing is necessary for compliance with any legal obligations to which the data controller is subject, other than an obligation imposed by contract;
- 4. The processing is necessary for the purposes of legitimate interests pursued by the data controller or by the third party or parties to whom the data are disclosed, except where the processing is unwarranted in any particular case by reason of prejudice to the rights and freedoms or legitimate interests of the data subject.

Where we need to process Special Category personal data we will use the following lawful basis:

Where we have obtained the data subject's freely given, specific, informed and unambiguous consent by way of a statement or clear affirmative action for one or more specified purposes.

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:

Purpose: Responding to queries about our business and services that we receive via this website or directly by phone, email or letter

- Lawful basis: The processing is necessary for the performance of a contract to which the data subject is a party, or for the taking of steps at the request of the data subject with a view to entering into a contract;
- The data subject has given consent to the processing;

Purpose: Delivering our services

- Lawful bases: The data subject has given consent to the processing;
- The processing is necessary for the performance of a contract to which the data subject is a party, or for the taking of steps at the request of the data subject with a view to entering into a contract;

Purpose: Raising awareness about, and then holding or participating in, the events or activities that we (or others) may hold or undertake;

• Lawful bases: The data subject has given consent to the processing;



The processing is necessary for the purposes of legitimate interests pursued by the data
controller or by the third party or parties to whom the data are disclosed, except
where the processing is unwarranted in any particular case by reason of prejudice to
the rights and freedoms or legitimate interests of the data subject. We believe that it is
in the legitimate interests of both CAG Consultants and individuals raising awareness
about, and then holding or participating in, the events or activities that we (or others)
may hold or undertake;

Purpose: raising awareness about, promoting or providing the services that we (or others) may provide;

- The data subject has given consent to the processing; providing information, insights and updates that we (or others) may publish
- 1. Where the data subject has given consent to do so in respect of these activities:
 - sending communications about our activities to data subjects in line with their requests and preferences,
 - 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.
- 2. Where the processing is necessary for the performance of a contract:
 - administering and sending service information by post, where this is the only or most appropriate way of contacting a data subject, or transmitting information.
 - undertaking research and other activities in pursuance of a contract with a third party,
 - 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
- 3. 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 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,
 - processing enquiries and requests for our services, and reviewing, considering and responding to those enquiries and requests.



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. 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 UK If we do, Data Subjects can expect a similar degree of protection in respect of their personal information.

- Where we transfer information outside the European Economic Area (EEA), we
 will make sure that it is protected in the same way as if it was being used in the
 EEA. To do this we will use one or more of these safeguards:
 - Only transfer it to a non-EEA country with privacy laws that give the same protection as the EEA as specified by the European Commission



- and which has been determined as adequate by the UK or EEA;
- Ensure that a contract with the recipient (data processor) is in place that contains a standard contractual clause as approved by the Information Commissioner's Office.

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 are using other companies' services:

We currently use:

• Instant on IT (for IT and website services)

In addition, we use the services of the following companies which are data controllers in their own right. We advise that you read their privacy notices:

- 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.
- Microsoft, which we use for software services. For further information, please see Microsoft's privacy policy <u>here.</u>
- Roll, which we use for project management services. For further information, please see Roll's privacy policy here. Xero, which we use for book-keeping and invoicing services. For further information, please see Xero's privacy policy here.
- Mentimeter, which we use for online polls during workshops. See Mentimeter's privacy policy here.
- Miro and Mural, which we use for whiteboard services during workshops. See Miro's privacy policy here and Mural's privacy policy here.

Any company whose services we use in this way is required to treat your data as carefully as we do and use it only in the course of the work they are doing for us.

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

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.

We use third parties to store personal data.

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.

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.

Data Subjects' rights in connection with personal information

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

- 1. *Request access* to their personal information (commonly known as a "data subject access request"). This enables them to receive a copy of the personal information we hold about them.
- 2. *Request correction* of the personal information that we hold about them. This enables them to have any incomplete or inaccurate information we hold about them corrected.
- 3. Request the erasure of their personal information. This enables them 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 their personal information where we are relying on a legitimate interest (or that of a third party). A Data Subject also has the right to object where we are processing their personal information for direct marketing purposes.
- 5. Request the restriction of processing of their personal information. This enables them to ask us to suspend the processing of personal information about them, for example if they want us to establish its accuracy or the reason for processing it.
- 6. Request the transfer of their personal information to another party.

If a Data Subject wants to review, verify, correct or request erasure of their personal information, object to the processing of their personal data, or request that we transfer a copy of their personal information to another party, they should contact our DPM.

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 their consent to the collection, processing and transfer of their personal information for a specific purpose, they have the right to withdraw their 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 their consent, we will no longer process their information for the purpose or purposes originally agreed to.

If the service that you receive is going to be affected by your withdrawal of consent we will advise you of this.

You have the right to stop direct marketing at any time.

Some messages we send you may be classed as service emails, and if we have a contract with you to deliver services you cannot withdraw consent to receive them.

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, 150 Minories, London, EC3N 1LS.

