

Brooke Petter Associates Ltd

Privacy Notice & Cookie Policy

This Privacy Notice is designed to help you understand our data gathering and processing operations, and what your legal rights are.

We have tried to keep this notice as simple as possible and we will update this before making any changes to the way we process your personal data in the future.

Brooke Petter Associates Ltd (BPA) takes its responsibility for protection of your data seriously. If there is anything in this policy you don't understand or if you want to ask any questions, please feel free to contact us using the details below.

Who are we?

We are Brooke Petter Associates Ltd, registered in England and Wales at 19 Church St, Ross on Wye. HR9 5HN. Registration no: 1132 4406

In this notice we may refer to ourselves as 'BPA Ltd'

What kind of personal data will we ask you to provide?

BPA Ltd will only ever ask for personal data if it is required for a specific purpose; with that in mind we have created a full list of all the kinds of personal data that we may ask you to provide in order to achieve those purposes. The kinds of personal data we may collect are:

Data subjects/Data categories:

- Contractors and contracted staff and applicants: Name, address, telephone, email, bank account details, NI Number
- Clinician participants in website-based media: Place of work contact, name, address, telephone, email, telephone, email,
- Public users not in the above groups: Name, address, telephone, email
- Professional or principal contacts: Name, address, telephone, email

Why do we collect personal data?

We will use personal data firstly to fulfil any contractual obligations that exist between us and yourself. Where we request personal data to be provided to meet the terms of any such contract, you will be required to provide the relevant personal data or we will not be able to provide the goods and/or services that you want. In such cases the lawful basis of us processing the personal data is that it is necessary for the performance of a contract.



We may also process your personal data in accordance with our legitimate business interests; this is on the considered measure that we need the personal data to achieve the various purposes and that it could be reasonable for an individual to expect their data to be used for those purposes.

Our data processing activities conducted on the lawful basis of 'legitimate interests' are:

- To provide you with goods and services you are looking for
- To inform you of other goods and services we provide, or offers that may interest you (direct marketing)
- To send notifications on subjects you have subscribed to, or otherwise asked us to keep you informed of
- To allow us to understand the scale and range of our customer base, for statistical analysis and market research
- Improve website so that we can deliver better content
- To recognise when customers re-engage with our services
- To allow us to support and maintain our products in active service
- To enhance the security measures in place that protect data we are responsible for
- To protect the company's assets

We may also process your personal data in order for BPA Ltd to comply with our various legal obligations; these might include:

- Providing for financial commitments between us and yourself, or to relevant financial authorities
- Complying with industry regulatory requirements and any self-regulatory schemes
- Cooperating with relevant authorities for reporting criminal activity, or to detect and prevent fraud
- To investigate any insurance claims, claims of unfair dismissal, claims of any kind of harassment or of discrimination, or any other claim whereby we may have to defend ourselves.
- Where we have received your consent to do so we will process your personal data.

You may withdraw your consent for us to process your personal data for these purposes at any time. If we receive a withdrawal of consent from you, we may contact you to verify the request.

Withdrawing your consent for us to process your personal data will not affect the lawfulness of the processing beforehand.

Where did we obtain your personal data?

Most of the data we source comes from directly from you. We may also source data from public media organisations such as; (not an exhaustive list):

- Facebook
- LinkedIn
- Twitter



- Other organisation public web sites

We may gather personal data from sources including:

- Technical sources that gather data over time when you visit our online platforms
- From third party organisations. This can mean your personal data has been provided directly by another company for a specific purpose, or where you may have accessed our platforms through a third-party online service
- Local or national authorities provided for specific purposes

Who might we share your information with?

We may share your personal data with other branches of our company. This would include any subsidiary, investing or holding company (each as defined by the Companies Act 2006) of BPA Ltd.

In order to achieve the above stated purposes for which we process your personal data, we may need to share your personal data with various third-party service providers who act as data processors.

We may share your personal data with third party organisations acting as data controllers or with specific individuals, groups or other organisations who act as neither data controllers nor data processors, but only where we are either legally required to do so by law, or where doing so is necessary to achieve the intended stated purpose of processing the data.

In the event that we sell or reorganise our business, or if otherwise required by law or by an authorised regulator, we may transfer your personal data as a part of the general business data to the relevant parties.

Where will my data going to be stored?

Whenever BPA Ltd transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

How long will we keep your data for?

We will keep your personal data only for as long as required in order to achieve the purposes for which it was gathered, in line with this privacy notice.

In determining when personal data should be erased, we will take into consideration the amount of and sensitivity of the personal data we have, the amount of harm that could be



caused by a data breach, the benefits of the purposes the data is being used for and any legal requirements that we are bound to.

You may request that we erase your personal data at anytime, though in cases where there is a remaining relevant or legal reason why we are required to keep the data we may opt to restrict the amount of processing being conducted to what is absolute necessary, in line with your legal rights in order to minimise the impact the processing will have.

Cookies and similar technology

When you visit our sites or when you use our sites, we may collect personal data from you automatically using 'cookies' or similar technology.

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use cookies to identify which pages of our sites are being used. This helps us analyse data about web page traffic and improve our sites, in order to tailor them to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system. If you complete a survey within our site, the data is anonymised. The survey provider uses third party cookies and the experience you receive will be based upon your settings.

Overall, cookies help us provide you with a better site, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept cookies or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. However, if you select this setting you may be unable to access certain parts of our Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our Site.

How do I disable cookies?

If you want to disable cookies you need to change your website browser settings to reject cookies. How you can do this will depend on the browser you use.

Your Rights, Our Responsibility

There are several rights granted to you immediately upon providing us with your personal information; some of these are mentioned above. BPA Ltd takes your rights seriously and will always conduct ourselves in a way that is considerate of our responsibility to serve those legal rights.



You have the Right of Access

You have the right to confirm whether or not your personal data is being processed, and to be provided with relevant details of what those processing operations are and what personal data of yours is being processed.

If you would like access to the personal data we have about you, we ask that you contact us by using any of the details below.

The Right to Rectification

If you notice that the data we have about you is inaccurate or incomplete, you may request we rectify the mistake. We will make every effort to respond to requests of this type immediately.

The Right to Objection

If you wish to object to the way we use, or have used, your personal data you may do so freely.

The Right to Portability

We are legally obliged to pass on all of the details you have provided to us in a machine-readable format, either to your or to another provider of your choosing.

The Right to Complain

We will always try to maintain the highest standards and encourage the trust that our customers have in us as an organisation. In order to do this, we request that any complaints be first brought to our attention so we can properly investigate.

If however you would like to complain about BPA Ltd to a supervisory authority you may do so by contacting the Information Commissioners Office on 0303 123 1113, or anyone of the other reporting methods listed on their website – <https://ico.org.uk/concerns>

If you wish to get in touch with BPA Ltd, please use any of the following contact details:

Brooke Petter Associates Ltd

19 Church St,

Ross on Wye.

HR9 5HN

Telephone: 0117 251 0173

Online: www.brookepetter.co.uk www.pipc.uk