



Carrley® Business Consulting Ltd: GDPR Data Privacy Notice, including Website Terms & Conditions

This GDPR Data Privacy Notice, which incorporates our Website Terms and Conditions at Section 13, sets out the policy basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the Notice carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the “GDPR”).

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to ‘personal data’ meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR).

Special categories personal data - The GDPR refers to sensitive personal data as ‘special categories of personal data’ (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

Carrley® Business Consulting Ltd (We) is the data controller. This means we decide how your personal data is processed and for what purposes.

We are committed to protecting and respecting your privacy.

3. The purpose(s) of processing your personal data

We may use your personal data for the following purposes:

- To understand your business requirements and determine any services to be offered/provided.
- To provide you with any information requested or deemed appropriate by us regarding our consultancy services.
- To send our proposal/quotation/bid/tender/contract/terms and conditions for appropriate services.
- To fulfil any contractual obligations entered into between us and yourselves.
- To send you our services invoices and any necessary payment reminders.
- To keep our website secure and avoid fraud.
- To handle any ongoing enquiries and any complaint which you have regarding our services.
- To provide you with occasional service updates which are non-marketing in nature.

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section above, we process the following categories of your data:

- Personal data – which may consist of name, job title, email address, mobile telephone number, telephone number, address, financial information, online identifiers – which include IP addresses and cookies.

We do not collect special categories of data.

By communicating with us/ contacting us - either by telephone, email, our website email links or other website contact mechanisms you provide personal data which we may collect, store and use.

We may also have obtained your personal data through publically accessible sources – such as your business website, internet searches, social media and credit searches

5. Our lawful basis for processing your general personal data is:

Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract.

More information on lawful processing can be found on the [ICO website](#).

6. Sharing your personal data & disclosure

Your personal data will be treated as strictly confidential.

We may disclose your information to any of our employees, officers, insurers or professional advisers insofar as reasonably necessary for the purposes set out in this Notice.

We may also disclose your information:

- If required or permitted to do so by law.
- If required to do so by any court or any applicable regulatory, compliance, governmental or law enforcement agency.
- If necessary in connection with legal proceedings or potential legal proceedings.

7. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary. We do this in order to make future contact to assess impact of our consultancy work or maintain contact to advise on availability of additional/ new services or in case of any complaints or legal claims.

8. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you (we may charge you for this, in accordance with the law).
- The right to request that we correct any personal data if it is found to be inaccurate or out of date.
- The right to request your personal data is erased where it is no longer necessary to retain such data.
- The right to request that we provide you with your personal data and, where possible, to transmit that data directly to another data controller, (known as the right to data portability).
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- The right to object to the processing of personal data, (where applicable) i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

9. Transfer of Data Abroad

We do not transfer personal data outside the EEA.

10. Automated Decision Making

We do not use any form of automated decision making in our business.

11. Further processing

If we wish to use your personal data for a new purpose, not covered by this Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

12. Keeping your information safe

We will take reasonable precautions (physical, managerial and electronic) to prevent the loss, misuse or alteration of your personal information.

We will store your personal information in password-protected, encrypted IT systems.

13. Website terms and conditions

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place reasonable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

However, you acknowledge that the transmission of data across the internet can be inherently insecure, and that we cannot guarantee security of data sent over the internet.

User information

In using our website, you provide certain information regarding your computer/device and visit. This can include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths. This information is provided to us by our service providers – Google Analytics and Microsoft MyLiveChat and you should read, understand and be comfortable with their own privacy notices as provided on their own websites. We are not responsible for the privacy policies of these service providers.

We do not share user information with third parties.

How we use cookies

This site uses cookies – small text files that are placed on your computer or other device to help the site provide a better user experience. In general, cookies are used to retain user preferences and track your movements, store information for things like shopping carts, and provide anonymised tracking data to third party applications like Google Analytics.

As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser or looking at [the About Cookies website](#) which offers guidance for all modern browsers.

Third party links

Our privacy notice and these website terms and conditions do not cover any third-party websites which are linked from our website. We encourage you to read the privacy notices on any third-party websites.

Please note that we cannot be held responsible for the currency, validity or correctness of content of any third-party website or webpages or for any action or decisions which you take as a result of using those websites or webpages.

14. How to contact us or make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our Data Representative at info@carrleybusiness.co.uk

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners Office.