

DWC Consulting Services Limited Fair Processing Notice/Privacy Notice

1. Scope

This notice applies to all data subjects (hereby referred to as ‘the data subject’, ‘the client’ or ‘you’) whose data is processed by DWC Consulting Services Limited (hereby referred to as DWC CONSULTING, ‘we’ or ‘us’).

2. Responsibilities

All employees of DWC CONSULTING who interact with data subjects are also required to ensure that this notice is brought to the attention of all data subjects, securing their consent for the processing of their personal data.

3. Fair Processing Notice

DWC CONSULTING will use the personal data collected from you for the following purposes:

- To contact you about training sessions and the services DWC CONSULTING offers,
- To register attendants on training sessions we offer,
- To process prospective candidate data for employed positions, all for recruitment services we offer to clients,
- To process payments and donations to DWC CONSULTING,
- To collect feedback from services we have delivered to you for evaluation purposes,
- To carry out academic research,

4. What is Personal Data?

The EU’s General Data Protection Regulation (“GDPR”) defines “personal data” as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

The GDPR classifies certain data as belonging to “special categories”, as follows:

- Racial origin;
- Ethnic origin;
- Political opinions;
- Religious beliefs;
- Membership to a trade-union;
- Genetic data;
- Biometric data;
- Health data;
- Data concerning a natural person's sex life;
- Sexual orientation; and
- Other.

The GDPR requires that consent is provided by the data subject for all types of personal data, including those pertaining to the special categories set out above and otherwise. Consent must be explicitly provided.

When DWC CONSULTING requests sensitive data from data subjects, it is required to confirm why the information is required and how it will be used.

5. Legal Basis

To store and process personal data, DWC CONSULTING relies on four legal bases:

- Data Subject Consent [GDPR, Art. 6 (1) (a)]
- Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract [GDPR, Art. 6 (1) (b)]
- Legal obligation [GDPR, Art 6 (1) c)]
- Legitimate Interest [GDPR, Art. 6 (1) (f)]

Consent

Data Subject Consent is the main legal basis for the storing and processing of personal data. When we collect your personal data, via our online booking forms, for the purpose of storing and processing it, we will always ask for your consent to do so in the form of a 'positive opt-in method' as recommended by the GDPR.

Processing Necessary for Performance of a Contract

Sometimes DWC CONSULTING will collect, store, and process personal data for contractual purposes. As stated in the GDPR, (Article 6, (1) (a)) "Processing should be lawful where it is necessary in the context of a contract or the intention to enter into a contract."

This includes:

- When DWC CONSULTING employs new paid workers and consultants,
- When DWC CONSULTING forms new partnerships with other service providers,
- When DWC CONSULTING undertakes a service or contract for a client.

Legal Basis

In some circumstances DWC CONSULTING is required to process personal data for compliance with a legal obligation to which DWC CONSULTING is subject.

This includes:

- Processing personal data for compliance with HMRC employment regulations
- Processing personal data on donations for compliance with HMRC regulations
- Compliance with a police/court investigation

Legitimate Interest

“Legitimate Interests” means the interests of our company in conducting and managing our business to enable us to give you the best service/products and the best and most secure experience.

It can also apply to processing that is in your interests as well.

For example, we may process your information to protect you against fraud when transacting on our website, and to ensure our websites and systems are secure.

When we process your personal information for our legitimate interests, we make sure to consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. Our legitimate business interests do not automatically override your interests - we will not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

We process personal information for certain legitimate business purposes, which include the following:

- **Direct Marketing:** We will contact you by post and telephone with marketing and fundraising asks which furthers our aims and objectives. We will make sure our communications are relevant to you, tailored to your interests. Those legitimate interests include providing you with information on our appeals, campaigning, services, products, fundraising, newsletter requests, feedback, competitions and other activities. DWC

CONSULTING only uses legitimate interest for solicited marketing where prior consent is not necessary. This includes:

- Post.
 - Live phone calls when there is no TPS/CTPS registration or objection.
 - Emails/text messages to individuals with soft opt-ins.
 - Emails/text messages to business contacts.
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- **Your best interest:** Processing your information to protect you against fraud when transacting on our website, and to ensure our websites and systems are secure.
 - **Personalisation:** Where the processing enables us to enhance, modify, personalise or otherwise improve our services/communications for the benefit of our supporters.
 - **Analytics:** To process your personal information for the purposes of customer analysis, assessment, profiling and direct marketing, on a personalised or aggregated basis, to help us with our activities and to provide you with the most relevant information as long as this does not harm any of your rights and interests.
 - **Research:** To determine the effectiveness of promotional campaigns and advertising and to develop our products, services, systems and relationships with you.
 - **Due Diligence:** We may need to conduct investigations on supporters, potential customers and business partners to determine if those companies and individuals have been involved or convicted of offences such as fraud, bribery and corruption.

Whenever we process data for these purposes we will ensure that we always keep your Personal Data rights in high regard and take account of these rights. You have the right to object to this processing if you wish, and if you wish to do so please click here [[link to Subject Information Request](#)]. Please bear in mind that if you object this may affect our ability to carry out tasks above for your benefit.

6. What data does DWC CONSULTING collect, how is it used and who has access to it?

We may collect the following personal data:

| <u>What data is collected?</u> | <u>Why is it collected?</u> | <u>Who has access to it?</u> |
|--------------------------------|-----------------------------|------------------------------|
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| <p>Contact Data (from our online forms, in person and other digital communication including, but not limited to, email, phone and mail)</p> <ul style="list-style-type: none"> • Name • Address • Email • Mobile • Telephone <p>Legal basis: Consent (or Legitimate Interest – see Legitimate Interest section)</p> | <p>Marketing</p> <p>DWC CONSULTING may use your ‘contact data’ to send you updates about the services we offer, as well as other relevant marketing material we consider relevant to you.</p> <p>Correspondence</p> <p>DWC CONSULTING may also use your ‘contact data’ to contact you about any other updates within our organisation we consider relevant to you.</p> <p>Feedback</p> <p>DWC CONSULTING may use your contact data to ask for feedback, or to issue surveys regarding our performance.</p> | <p>Within DWC CONSULTING all employees have access to contact data via our email server and online cloud-based file storage.</p> <p>Our marketing campaigns are often carried out but by our approved third party processor, Purple Banana Creative Design.</p> |
| <p>Website Usage Data (from our analytics tracking system)</p> <ul style="list-style-type: none"> • your IP address • geographical location • browser type and version • operating system • referral source • length of visit • page views and website navigation paths | <p>Website Analysis, Development and Maintenance</p> <p>DWC CONSULTING may use your website usage data to:</p> <ul style="list-style-type: none"> • Administer our website and business • Analyse web traffic to our website | <p>Our website usage data is collected, processed and stored by our approved third party processor, Purple Banana Creative Design.</p> <p>You can find their details below in Section 7.</p> |

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| <ul style="list-style-type: none"> information about the timing, frequency and pattern of your service use <p>Legal basis: Legitimate Interest</p> | | |
| <p>Transaction Data (from invoices sent out by us)</p> <ul style="list-style-type: none"> Contact Data (as above) Your Card Details Your bank account details Transaction details <p>Legal basis: Consent</p> | <p>To process payments and donations to DWC CONSULTING</p> <p>DWC CONSULTING will use 'transaction data' provided to process online payments (by sending receipts/invoices/proposals).</p> <p>DWC CONSULTING may also use your transaction data to send statements, invoices and payment reminders to you, and collect payments from you</p> | <p>Within DWC CONSULTING, all employees have access to your Transaction Data.</p> |
| <p>Recruitment Data (from our Recruitment Service Form)</p> <ul style="list-style-type: none"> Name Email address Contact Telephone/Mobile Contact Details (from attached CV/Covering Letter) Financial Details (if employed) <p>Legal basis: Consent, Legitimate Interest, Legal Obligation</p> | <p>To process prospective candidate data for paid employment by us, or for a client who has hired us for that purpose</p> <p>DWC CONSULTING will use 'recruitment data' to process applicants for employment by DWC CONSULTING or for a client.</p> <p>DWC CONSULTING will use recruitment data to contact applicants in relation to their job application</p> | <p>Within DWC CONSULTING, your 'recruitment data' is processed by all employees authorised by the Senior Partner.</p> <p>Recruitment data can be shared with clients when DWC CONSULTING has been contractually charged to provide a recruitment service by and for them.</p> |

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| | DWC CONSULTING will use your financial details (if employed) to process payments to employees. | |
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7. Providing your personal data to others

DWC CONSULTING is committed to ensuring the safe collection, storage and processing of all personal data it collects. DWC CONSULTING shall only engage with third party data processors that are able to provide security, including technical, physical or organisational security, to all personal data that they process on DWC CONSULTING's behalf.

The Data Protection Officer will ensure that a full Privacy Impact Assessment (PIA) has been carried out on all third party data processors before any personal data is transferred as per our Third Party Access to Data Policy (DP3).

DWC CONSULTING may disclose your information to third party processors for the following reasons:

- We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.
- We may disclose your 'contact', 'correspondence' and 'website usage' data to our IT contractors (Purple Banana Creative Design) insofar as reasonably necessary for the distribution of marketing material via email and analysis of web traffic.
- In addition to the specific disclosures of personal data set out in this section, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

DWC CONSULTING does not use any third party processors outside of the European Economic Area (EEA).

8. Retaining and deleting personal data

This section sets out DWC CONSULTING's data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

We will retain and delete your personal data as follows:

| | |
|--|---------|
| Website Usage Data | 6 years |
| Contact and Correspondence Purposes | |
| Recruitment Data and HR Records | 6 years |
| Transaction & Financial Records | 6 years |

9. Your rights

As per the General Data Protection Regulations, you, the data subject, have certain rights that you are free to exercise. We have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

i. The right to access

You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

ii. The right to rectification

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

iii. The right to erasure

In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed
- you withdraw consent to consent-based processing
- the processing is for direct marketing purposes

- the personal data have been unlawfully processed

However, there are certain general exclusions of the right to erasure. Those general exclusions include where processing is necessary: [for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims].

iv. The right to restrict processing

In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are:

- you contest the accuracy of the personal data
- processing is unlawful but you oppose erasure
- we no longer need the personal data for the purposes of our processing
- you require personal data for the establishment, exercise or defence of legal claims
- you have objected to processing, pending the verification of that objection.

Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it:

- with your consent
- for the establishment, exercise or defence of legal claims
- for the protection of the rights of another natural or legal person
- for reasons of important public interest.

v. The right to object to processing/profiling

You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for:

- the performance of a task carried out in the public interest or in the exercise of any official authority vested in us
- the purposes of the legitimate interests pursued by us or by a third party

If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

Similarly, you have the right to object to our processing of your personal data for direct marketing purposes and to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular

situation. If you make such an objection, we will cease to process your personal data for this purpose, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

vi. The right to data portability

To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

vii. The right to complain to a supervisory authority

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

viii. The right to withdraw consent

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

You may exercise any of your rights in relation to your personal data by written notice to us using our *Subject Information Request Form (DP7)*.

10. Cookies

DWC CONSULTING's websites use cookies, a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

We use **session cookies** on our website.

Most browsers allow you to refuse to accept cookies; for example:

- in Internet Explorer (version 11) you can block cookies using the cookie handling override settings available by clicking “Tools”, “Internet Options”, “Privacy” and then “Advanced”;
- in Firefox (version 47) you can block all cookies by clicking “Tools”, “Options”, “Privacy”, selecting “Use custom settings for history” from the drop-down menu, and unticking “Accept cookies from sites”; and
- in Chrome (version 52), you can block all cookies by accessing the “Customise and control” menu, and clicking “Settings”, “Show advanced settings” and “Content settings”, and then selecting “Block sites from setting any data” under the “Cookies” heading.

Blocking all cookies will have a negative impact upon the usability of many websites.

If you block cookies, you will not be able to use all the features on our website.

You can delete cookies already stored on your computer; for example:

- in Internet Explorer (version 11), you must manually delete cookie files (you can find instructions for doing so at <http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-11>);
- in Firefox (version 47), you can delete cookies by clicking “Tools”, “Options” and “Privacy”, then selecting “Use custom settings for history” from the drop-down menu, clicking “Show Cookies”, and then clicking “Remove All Cookies”; and
- in Chrome (version 52), you can delete all cookies by accessing the “Customise and control” menu, and clicking “Settings”, “Show advanced settings” and “Clear browsing data”, and then selecting “Cookies and other site and plug-in data” before clicking “Clear browsing data”.

11. Our details

The data controller, and manager of this website, is **DWC CONSULTING SERVICES LIMITED**. We are a registered company in [England and Wales] under registration number **11774308**.

We are registered at the Information Commissioner’s Office (ICO) under registration number **ZA560248**.

Our registered office is at:

Unit 6
30 Friern Park
London
N12 9DA

You can contact us:

- by post, using the postal address above
- using our website contact form
- by telephone, on 0203 837 4963
- by email, on oliva.mohtady@dwcglobal.co.uk