

## PRIVACY NOTICE

### Purpose of this Notice

This Privacy Notice sets out how CMC Partnership Consultancy Ltd ('we') use and protect any personal data that you provide, or that we collect from you during our everyday business activities.

### **We are committed to ensuring that your privacy is protected and appropriately managed.**

We collect, use and disclose personal information (information by which an individual can be identified) to perform our business activities and to provide customer services; primarily the provision of business change management consultancy and the recruitment and selection of permanent staff, suppliers and products to deliver those services.

We do not use automated decision-making or profiling.

By providing your personal information to us you agree that this Privacy Notice will apply to how we handle your personal information, and you consent to us collecting, using and disclosing your personal information as detailed in this Notice. This includes consent to us using and disclosing your personal sensitive information solely for the purpose for which it was collected unless we subsequently receive your consent to use it for another purpose.

When you provide personal information in regard to a third party, e.g. providing emergency or referee details, you agree that you have obtained the consent of the other person (third party) for us to collect, use and disclose their personal information in accordance with this Privacy Notice, and that you have made the other person aware of your actions and of this Privacy Notice.

If you do not agree with any part of this Privacy Notice you must not provide your personal information or the personal information of others to us.

Please note if you do not provide us with your personal information, or if you withdraw the original consent you provided under this Notice, then this may affect our ability to provide services to you, or negatively impact the services we provide to you.

We may change this Notice from time to time by updating this page. You should check this page from time to time to ensure you are happy with the changes we make. This Privacy Notice version 4 is effective from 23<sup>rd</sup> November 2021 and available to download for reference from the bottom of the page, as are previous versions.

## **Data Handling Practices as defined by this Privacy Notice**

### **1. Personal data handling and the law**

The company recognises its responsibility to protect the privacy of all individuals. This Privacy Notice outlines CMC's information security handling practices in accordance with the UK Data Protection Act 2018 and the General Data Protection Regulations (GDPR).

We will only process your information where:

- You have given your consent to such processing by voluntarily providing us with your information, which you can withdraw at any time.
- The processing is necessary to provide our services to you.
- The processing is necessary for compliance with our legal obligations.
- The processing is necessary for our legitimate interests, or those of any third-party recipients that receive your personal information.

### **2. Information which we may collect from you**

We typically process the following types of personal information:

- Contact name, email, address and phone number.
- Employment verification information, including identity and criminal record checks.
- Information to support you working with us, including contractual information and provision of benefits.

You may choose to share your personal data with us by making an online enquiry or by sending us an email, by completing a survey, or by providing your details by letter, by telephone, electronically or by completing an internal form to support your employment or contractual status with the company.

This may include subscribing to any of our services; requesting newsletters, obtaining downloads, registering for events and online webinars, providing your details to us at events, contacting us through social media channels, accounting and administration (business to business), or applying for an opportunity in which you may be asked to provide your name, address, email and contact numbers, etc. If you contact us, we may keep a record of that correspondence and we may retain details of your visits to our website including, but not limited to, traffic data, location data, weblogs and other communication data and a record of the resources you access.

We may keep a record of your website preferences and interests, other information relevant to customer surveys, offers made by us and details of the transactions you complete through the website and the fulfilment of your orders.

### **3. Use of your information**

We will use your personal information to contact you in response to your enquiry or application, to share information with you, to contact you about future opportunities which may be of interest to you, or to support your continued employment/contractual arrangements with CMC. We will store your contact data for recording purposes and, when appropriate, to provide you with information regarding other CMC products and services that you may be legitimately interested in. We may also contact you to ask you to complete surveys that we use for research purposes, although you do not have to respond to them. You have the option to unsubscribe from these communications at any time.

### **4. Location of your information**

#### **4.1 Responding to vacancies and processing of job applications**

CMC uses [Broadbean Aplitrak](#) services to advertise vacancies on job boards, social media channels and on our website.

##### **Web site Applications:**

Applications made on our website are processed using Job Relay, an API provided by [High Rise Digital](#) using [MailGun](#) to transfer application data from [consultcmc.com](#) direct to [Broadbean's](#) hosting environment, Amazon Web Services Ireland. Applications are then processed into CMC's O365 Microsoft Azure UK Tenancy and onto Amazon Web Services USA for further processing using a CV parsing service provided by Daxtra. Once parsed, applicant data is transferred back into CMC's O365 Microsoft Azure UK Tenancy. Your data is automatically deleted from Broadbean and the Daxtra parsing service within 30 days of receipt, and within 3 days from MailGun.

##### **Third Party 'Job Board' Applications**

CMC also advertises vacancies on responsible third-party websites and professional job boards, e.g. Security Cleared Jobs. In these scenarios your data is processed initially by the third party before it is transferred onto CMC's Broadbean Aplitrak services as described above. By using these sites you will be accepting the job board's data processing and retention policies.

#### **4.2 General website enquiries**

Data received through our website [www.consultcmc.com](#) is stored and processed in professional UK located datacentres provided by [Vultr](#). A backup is managed in a secondary UK-based server by our Website Provider [Design Dough](#). A copy of your enquiry is also processed into CMC's O365 Microsoft Azure UK Tenancy using MailGun. Data is deleted from the website and MailGun within 3 days of receipt.

### **4.3 E-signing**

CMC uses DocuSign. Data collected through the signing process is downloaded directly into CMC's O365 Microsoft Azure UK Tenancy and is automatically deleted from DocuSign within 30 days of receipt.

### **4.4 Survey Monkey**

Survey Monkey is used to support data gathering when clients wish to evaluate their Business Agility. When you and your organisation take part in this activity through making an enquiry or completing the survey your data is processed and hosted by Survey Monkey. CMC may transfer the data you provide into CMC's O365 environment for further analysis. A 'need to know' policy is in place to manage access to your data controlled by both CMC and Survey Monkey. CMC manages the retention of your data within its O365 environment and within [Survey Monkey](#) as defined in section 5. of this privacy notice.

### **4.5 Other data collected through day-to-day business activities**

Data collected through any other means is acquired, processed and managed within CMC's O365 Microsoft Azure services. Data collected through Microsoft Forms is currently processed in the EU and then transferred into our UK tenancy.

## **5. Data retention**

The company maintains a 7-year data retention policy. Business records may be maintained for longer periods if the company has a legitimate reason to support this retention.

Personal data is deleted when it is no longer required by the company to support business, legal, HR or contractual requirements.

Staff records are maintained for the duration of employment plus a further 7 years once employment has ceased.

Data processed on CMC's behalf by Broadbean Aplitrak, Daxtra and DocuSign is automatically deleted by these providers within 30 days of receipt.

Mail Gun records are deleted within 3 days.

## **6. Disclosure of your information**

Where we have a legal basis to do so we may disclose your personal information to third party contractors and suppliers including but not restricted to benefit providers, travel providers, IT service equipment and data hosting providers, parties supporting remote working on customer sites and external business advisors, such as lawyers, accountants and auditors.

Minimal data transfer takes place within our company, but please be aware that employee and contractor personal data may be shared with third parties and transferred to their storage and sub-processing destinations to support contractual customer delivery arrangements. You will be informed before this takes place. Please be assured that the company has contractual agreements in place with these sub-processors which include data protection standard clauses. A list of sub-processors used by us can be provided on [request](#).

In the event of sale, merger, de-merger or other reorganisation of the business, your personal data will be shared and processed in accordance with the legitimate interests of CMC and the relevant third parties.

In all cases data sharing will only take place when appropriate contracts, including confidentiality and/or data transfer obligation where required are completed with the planned recipient/s of your data.

We will disclose your personal information if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions of use, or to protect the rights, property, or safety of our companies, our customers or others. This includes exchanging information with other companies and organisations for the purpose of fraud protection and credit risk reduction, or to comply with UK Government regulations.

## 7. Your rights

We make every effort to maintain the accuracy and completeness of your personal information; however, you can assist us by contacting us if there are changes to your personal information, or if you become aware that we have inaccurate personal information relating to you. We will not be responsible for any losses arising from inaccurate, inauthentic, deficient or incomplete personal information that you or a person acting on your behalf provides to us.

You have the right to contact us at any time in relation to your rights below, which include:

- The right to be informed – be notified of how we process your data
- The right of access – request a copy of the data we hold about you
- The right to rectification – request that we amend any incorrect or incomplete data
- The right to erasure - request that we erase your data
- The right to restrict processing – request that we stop processing your data
- The right to object – to object to us processing your data

We do not use automated decision-making or profiling.

We can provide you with a portable copy of the data we process on your behalf on your request.

Please [email](#) or write to the **Data Protection Lead, CMC Partnership Consultancy Ltd** using the following address: **Excalibur House, Priory Drive, Newport, NP18 2HJ.**

You can at any time tell us not to send you marketing communications by [email](#), by using the contact information above, or by clicking on the unsubscribe link within the marketing emails you may receive from us.

## 8. Making a complaint

If you want to make a complaint, please contact our data protection lead, Jane McIntosh, using the contact details above or via [privacy@consultcmc.com](mailto:privacy@consultcmc.com). If you wish to make a complaint about the way we have handled or managed your data, and/or if you are not happy with the responses you have received from us, please contact the ICO directly.

CMC Partnership Consultancy Ltd. is registered as a data controller with the ICO ZA469055.

## 9. Security

We are committed to ensuring that your information is secure. We have reasonable security measures in place in order to protect your personal information from unauthorised access, use, alteration and disclosure.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site. Any transmission is at your own risk.

Once your information is received it is managed in line with recognised industry security good practice to safeguard it as best we can, but we cannot guarantee that the security measures we have in place will never be defeated or fail, or that such measures will always be sufficient or effective.

Please note that:

- Your personal information will only be seen by those who have a legitimate reason for seeing it.
- Third parties who are authorised to access, store and manage our data sets (which include your personal information records) are bound by confidentiality agreements.
- By submitting your personal data, you agree to this transfer, storing and processing.

## 10. Links to other websites and social media platforms

Our websites and the communications you receive from CMC Partnership Consultancy Ltd may contain links to other websites of interest. If you use these links, please be aware that we do not have any control over that other website and therefore we cannot be held responsible for the protection and privacy of any information which you provide whilst visiting such sites. Such sites are not governed by this Privacy Notice. Please exercise caution and look at the privacy statement applicable to the website in question.

Your interactions with social media platforms and us are governed by the privacy notice of the third-party company providing them. CMC interacts with LinkedIn, Instagram, YouTube, Vimeo and Twitter. Please refer to their privacy policies before you utilise their services.

## 11. IP addresses

When you access our website, use any of our mobile applications, or open electronic correspondence or communications from us, our servers may record data regarding your device and the network you are using to connect with us, including your IP address. An IP address is a series of numbers which identify your computer, and which are generally assigned when you access the internet. We may use IP addresses for system administration, investigation of security issues, and compiling data regarding use of our website, including the completion of webforms and downloads, and / or mobile applications.

## 12. Cookies – what is a cookie?

A cookie is a small file which asks permission to be placed on your computer records. Most browsers are initially set up to accept HTTP cookies. 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.

### How we use cookies

Cookies on the company's website [www.consultcmc.com](http://www.consultcmc.com) are used for a variety of different purposes, but generally their use breaks down into the following categories:

- **Strictly Necessary Cookies:** These are required for the operation of the website. They include, for example, cookies that enable approved users to log into secure areas of the website.
- **Analytical/Performance Cookies:** We use Google Analytics to gain insight into how our website is used, analysing information on pages visited, geographical location of our visitors, time spent on the website and the number of times a link has been clicked, amongst other useful anonymous statistics. `_gat`, `_gid` and `_ga` are enabled.
- **Functionality Cookies:** These improve the functional performance of our website and make it easier for you to use. For example, such cookies are

used to remember that you have previously visited the website and asked to remain logged into it if you have a user account. Cookies are also used by [www.consultcmc.com](http://www.consultcmc.com) to protect the security of the site, for example by blocking multiple form submissions. To give the best possible browsing experience, we use session cookies to temporarily store data. Session cookies are used to keep track of your activity as you move from page to page through the website. Our session cookies do not collect any personal/traceable data about you and are automatically deleted when you close your browser.

- **Targeting Cookies:** These record your visit to websites identifying the pages you have visited and the links you have followed. Targeting cookies are not enabled on [www.consultcmc.com](http://www.consultcmc.com).

## Removing & managing cookies

To ensure that you are always in control of your privacy, all web browsers give you the option to disable cookies. Most browsers are initially set up to accept HTTP cookies. For more information about HTTP cookies and how to disable them the following links may be helpful, or you can use the 'Help' option in your browser which should tell you how to stop accepting new cookies.

- Cookie settings in [Internet Explorer](#)
- Cookie settings in [Firefox](#)
- Cookie settings in [Chrome](#)
- Cookie settings in [Safari web](#) and [iOS](#)

## Useful Links

If you would like to find out more about privacy, cookies and their use on the internet you may find the following links useful; [Microsoft Cookies guide](#), [All about Cookies](#), [The Information Commissioner's Office](#).

## Previous Versions of this Privacy Notice

[V1.0](#)

[V2.0](#)

[V3.0](#)