



# PRIVACY POLICY

1 FEBRUARY 2020

# THE CLARITY PRACTICE GROUP LTD.

## PRIVACY POLICY

The Clarity Practice Group Limited, trading as 'The Clarity Practice' respects the privacy of individuals and their organisations and is committed to protecting your personal data and commercially confidential data.

This privacy policy sets out how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law in the UK protects you.

### 1. PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information about how The Clarity Practice collects and processes your personal data through your use of this website, including any data you may provide through this website.

It is important that you read this privacy policy so that you are fully aware of why and how we use your data. This privacy policy supplements our policies and notices provided to clients through our commercial contracts and agreements and is not intended to override them.

### 2. COMPLIANCE WITH UK LAW

The Clarity Practice privacy policy is compliant with relevant UK Laws and in particular it is designed to be conformant with the principles and guidance set out in the European laws on data protection as set out General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018.

### 3. CONTROLLER

This privacy policy is issued on behalf of the The Clarity Practice Group Limited; where there is a mention to "The Clarity Practice", "Clarity", "Company", "we", "us" or "our" in this privacy policy, it is referring to The Clarity Practice Group Limited and the Directors and staff responsible for processing your data. The Clarity Practice Group Limited is the "data controller" and responsible for your personal data and this website.

A Company Director is appointed who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

The Clarity Practice Group Limited  
Andrew Fenton  
andrewf@theclaritypractice.co.uk  
Lewis Building, Bull Street, Birmingham B4 6AF

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so would request that you contact us in the first instance.

### 4. CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 1 February 2020.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## 5. DISCLAIMER - THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

## 6. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- *Identity Data* includes first name, maiden name, last name, username or similar identifier. We do not request or store data regarding marital status, title, date of birth and gender.
- *Contact Data* includes normal office address or place of work, billing address, delivery address, email address and telephone numbers.
- *Technical Data* includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- *Profile Data* includes your username and password, your interests, preferences, feedback and survey responses.
- *Usage Data* includes information about how you use our website, products and services.
- *Marketing and Communications Data* includes your preferences in receiving marketing from us and your communication preferences.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## 7. HOW IS PERSONAL DATA COLLECTED?

We use different ways to collect data from and about you including through:

### Direct interactions

You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you

- apply for our products or services;
- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- give us feedback.

#### Automated technologies or interactions

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

#### Third parties or publicly available sources

We may receive personal data about you from various third parties and public sources as follows:

- Analytics providers, such as Google, based outside the EU;
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register.

#### 8. HOW WE USE PERSONAL DATA

We will use personal data in the following circumstances:

- Where it is necessary for our legitimate interests (or those of a third party) where your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

We do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us at [info@theclaritypractice.co.uk](mailto:info@theclaritypractice.co.uk).

#### 9. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose	Type of data	Lawful basis and legitimate interest
To manage our relationship with you which will include: Notifying you about changes to our terms or privacy policy, and asking you to leave a review or take a survey	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract or agreement with you</li> <li>• Necessary to comply with a legal obligation</li> <li>• Necessary for our legitimate interests</li> </ul>
To administer and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Technical</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests</li> <li>• Necessary to comply with a legal obligation</li> </ul>
To deliver relevant website content and promotional content to you and measure or understand the effectiveness of the promotional content we serve to you	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Usage</li> <li>• Marketing and Communications</li> <li>• Technical</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests</li> </ul>
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> <li>• Technical</li> <li>• Usage</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests</li> </ul>
To make suggestions and recommendations to you about our services that may be of interest to you	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Technical</li> <li>• Usage</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests</li> </ul>

## 10. MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising, to include:

### *Promotional offers*

We may use your Identity, Contact and Usage data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased services from us and, in each case, you have not opted out of receiving that marketing.

### *Website Cookies*

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

## 11. CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

We will not use your personal data for an unrelated purpose without notifying you to explain the change of purpose and the legal basis which allows us to do so.

## 12. DISCLOSURE OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in Section 9. and for the purposes set out in Section 8. above.

- Internal (Company) Staff
- External Third Parties
- Third parties to whom we may choose to sell, transfer, or merge parts of our Company or our assets. If a change of this nature occurs, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### 13. DATA SECURITY

Appropriate security measures have been implemented by the Company in line with ICO guidance, to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### 14. DATA RETENTION

We will only retain your personal data 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.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax or other financial reporting purposes.

In some circumstances you can ask us to delete your data, please contact us for information [info@theclaritypractice.co.uk](mailto:info@theclaritypractice.co.uk)