



NFH Consultancy Ltd

Privacy Policy

March 2019

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Introduction

Welcome to the NFH Consultancy Ltd's privacy notice.

We respect your privacy and are committed to protecting your personal data. This privacy notice will tell you about how we look after your personal data when you visit our website (wherever you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. You can also download a pdf version of the policy here <https://www.nfhconsultancy.co.uk/> in the 'Privacy notice' section of the website. Please also use the Glossary to help you understand some of the words we use in this privacy notice.

1. [IMPORTANT INFORMATION AND WHO WE ARE]

2. [THE DATA WE COLLECT ABOUT YOU]

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4. [HOW WE USE YOUR PERSONAL DATA]

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10. [GLOSSARY]

1. Important information and who we are

Purpose of this privacy notice

This privacy notice is to give you information about how we collect and process your personal data through this website, including any data you might give us through this website when you sign up to our newsletter, buy something or take part in a competition.

It's important that you read this privacy notice and any other similar notices we give you so that you have all the important details about how and why we're using your data. This privacy notice

supplements the other notices and is not intended to override them. Remember that this privacy notice should be read alongside our other notices; it doesn't replace them.

Controller

NFH Consultancy Ltd is the controller and responsible for your personal data (we'll call ourselves "we", "us" or "our" in this privacy notice).

Nicola is our data protection officer (DPO). This means that it's her job to deal with any questions you have about this privacy notice. So if you'd like to know anything about how we look after your data, including if you want to exercise any of your legal rights (which we talk about a bit below and which you can find more information on here [link to GDPR guidance]), then please get in touch with Nicola by emailing contact@nfhconsultancy.co.uk or by calling 07977 271754.

Contact details

Our full details are:

Full name of legal entity: NFH Consultancy Limited

Registered office: Boston Enterprise Centre, Enterprise Way, Boston, Lincolnshire. PE21 7TW

Company number: 08496332

Name or title of DPO: Nicola Humberstone, Managing Director

Email address: contact@nfhconsultancy.co.uk

Postal address: Boston Enterprise Centre, Enterprise Way, Boston, Lincolnshire. PE21 7TW

Telephone number: 07977 271754

NFH Consultancy Limited is a limited company registered in England and Wales.

IMPORTANT: you have the right to complain at any time to the Information Commissioner's Office (ICO), who supervise the protection of data in the UK. However, if you're not happy about the way we process your personal data or anything related to this then we would really

appreciate it if you give us the chance to sort it out first. So if you're not happy about the way we use or look after your data then please let us know first.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 25 March 2019.

The data protection law in the UK changed on 25 May 2018.

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.

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. When you leave our website, you should read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about you from which you can be identified. It doesn't include data where the identity has been removed (anonymous data).

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, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **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, purchases or orders made by you, 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 our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may

aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

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.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

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

- **Directly.** You may give us your Identity, Contact and Financial Data by filling in forms talking to us by post, phone, email or in other ways. This includes personal data you give us when you:
 - apply for our products or services;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us some feedback.
- **Automatically.** As you use 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 using our cookies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties:
 - (a) analytics providers such as Google based outside the EU;
 - (b) advertising networks [such as [NAME] based [inside **OR** outside] the EU]; and
 - (c) Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as accountancy firms and banks based inside the EU.
- Identity and Contact Data from data brokers or aggregators [such as [NAME] based [inside **OR** outside] the EU].
- Identity and Contact Data from publicly available sources [such as Companies House and the Electoral Register based inside the EU].

- Identity and Contact Data from social media websites such as Facebook, Twitter and Eventbrite based outside the EU.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most often, we will use your personal data in the following circumstances:

- Where we need to do what we're supposed to according to any contract we have with you.
- Where it is necessary for our legitimate interests (or a third party's legitimate interests) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

We have to rely on a lawful basis to control and process your personal data. Click [[here](#)] to find out more about the types of lawful basis that we will rely on to process your personal data. [protection-regulation-gdpr/lawful-basis-for-processing/](#)

Or cut and paste this in to your URL - <https://ico.org.uk/for-organisations/guide-to-the-general-data->

We don't usually rely on consent as a legal basis for processing your personal data except for when we send third party direct marketing communications to you by email or text message. You have the right to withdraw consent to marketing at any time by [contacting us](#).

Purposes for which we will use your personal data

The table below describes 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 necessary.

Remember that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

| Purpose/Activity | Type of data | Lawful basis for processing including basis of legitimate interest |
|--|---|--|
| To register you as a new customer | (a) Identity (b) Contact | Carrying out a contract with you |
| To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us | (a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications | (a) Carrying out a contract with you (b) Necessary for our legitimate interests (to recover money owed to us) |
| To manage our relationship with you which will include: (a) Telling you about changes to our terms and conditions or privacy policy | (a) Identity (b) Contact (c) Profile | (a) Carrying out a contract with you (b) Necessary to comply with a legal obligation |

| | | |
|--|--|--|
| (b) Asking you to leave a review or take a survey | (d) Marketing and Communications | (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services) |
| To allow you to take part in a prize draw, competition or complete a survey | (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications | (a) Carrying out a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business) |
| To run and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | (a) Identity (b) Contact (c) Technical | (a) Necessary for our legitimate interests (for running our business, providing administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation |
| To deliver relevant website content and adverts to you and measure or understand the how effective these adverts are | (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical | Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) |
| To use data analysis to improve our website, products/services, marketing, customer relationships and experiences | (a) Technical (b) Usage | Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) |
| To make suggestions and recommendations to you about goods or services that you might want to know about | (a) Identity (b) Contact (c) Technical (d) Usage (e) Profile | Necessary for our legitimate interests (to develop our products/services and grow our business) |

Marketing

It's very important to us that we give you choices about certain personal data uses, especially around marketing and advertising. We have set up the following personal data control mechanisms:

- We will not market any information to you without a request from you or without you or your company representatives attending one of our events or events we attend.
- We use our website and social media to promote our services and things of interest.
- We may share your data with third party associates who have further expertise you may require [e.g., accountancy professionals] [or other individuals or organisations acting as consultants who may be able to give your more help with any issues you approach us with] provided that you give us express consent to do this.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to decide what we think you may want or need, or what might be interesting to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will get marketing communications from us if you have asked for information from us or bought something from us [or if you provided us with your details when you entered a competition or registered for a promotion] and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your explicit opt-in permission before we share your personal data with any company outside NFH Consultancy Limited for marketing purposes.

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 be aware that you might not be able to use some parts of this website and/or parts of this website might not work properly.

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. If you would like us to explain how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will tell you and we will explain the legal basis which allows us to do so.

Please be aware that we may process your personal data without you knowing or without your consent, in following the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the people and organisations set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties as set out in the [*Glossary*].
- Specific third parties listed in the table in [*paragraph 4*] above.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to use it in a way that the law allows. We do not let our third-party service providers use your personal data for their own purposes and only allow them to process your personal data for specified purposes and according to our instructions.

6. International transfers

Whenever we transfer your personal data out of the European Economic Area (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. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en). https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en
- 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. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en). Or cut and paste the following link in to your URL - https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. Data security

We have set up security measures to stop your personal data from being accidentally lost, used or accessed in a way that it shouldn't be or is not allowed to be, and to make sure that it isn't changed or given out. We also limit access to your personal data to the employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they have to keep the information confidential.

We have put in place procedures to deal with situations where we suspect that your personal data security has been breached and will let you and any applicable regulator know of a breach where the law says that we have to.

8. Data retention

How long will you use my personal data for?

We will only keep your personal data for as long as we need to and for the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To decide how long to keep the personal data for, we think about the amount, nature, and sensitivity of the personal data, the risk of harm from your personal data being used or given out in a way it shouldn't be. We also think about why we process your personal data and whether we can do this for the same reasons and achieve the same goals in another way, and the relevant legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) even after they aren't customers anymore for tax purposes and demonstrate compliance.

In some circumstances you can ask us to delete your data: see [*Request erasure*] below for further information.

In some circumstances we might make your personal data (so that it can no longer be associated with you) for research or statistical purposes. In this case we may use this information for as long as we like without talking about it further with you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These are set out in the [Glossary].

If you wish to exercise any of these rights or would like more information, please [contact us](#).

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. We might also refuse to cooperate with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and make sure that we protect your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not given to any person who has no right to have

it. We could also contact you to ask you for further information about your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than month if your request is particularly complicated or you have made lots of requests. In this case, we will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to allow us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do 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). You can get further information about how we assess our legitimate interests against any potential impact on you in relation to specific activities by [contacting us](#)

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

External Third Parties

- Service providers acting as processors based in the EEA who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (known as a "data subject access request"). This lets you get a copy of the personal data we hold about you and to check that we are processing it according to the law.

Request correction of the personal data that we hold about you. This lets you have any incomplete or inaccurate data we hold about you corrected, although we might need to make sure that the new data you have given us is accurate.

Request erasure of your personal data. You can ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully used your right to object to processing (see below), where we may have processed your information illegally or where we have to delete your personal data to comply with local law. Be aware, however, that we might not always be able to comply with your request of erasure for specific legal reasons which will be tell you about, if applicable, when you ask us to delete the data.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may show that we have convincing legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. You can ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to make sure that the data is accurate; (b) where we use the data illegally but you do not want us to delete; (c) where you need us to hold the data even if we no longer need it because you require it for legal reasons e.g. if you have to go to court; or (d) you have objected to us using your data but we need to find out whether we have overriding legal grounds to use it.

Request the transfer of your personal data to you or to a third party. We will give to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Remember that this right only applies to automated information which you first gave consent for us to use or where we used the information as part of a contract we had with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will tell you if this is the case at the time you withdraw your consent.