

Privacy & Cookie Policy

DATE: 31/08/2018

Privacy Policy

Why you should read this policy

We ask that you read this Privacy Policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

Who we are

<http://www.sevenhill-group.com> (Website) is operated by Sevenhill Group Limited. We are a training development consultancy specialising in team and behavioural training, incorporated and registered in England and Wales under company number 05626962, whose registered office address is at Foxley Barn, Church Road, Tadley, Hampshire, RG26 3AU.

Sevenhill Group ('We' or 'us') collect, use and are responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and the Data Protection Act 2018. We are responsible as 'controller' of that personal information for the purposes of those laws.

Our collection and use of your personal information

Information that you provide

We collect personal information about you when you send feedback, post material, contact us for any reason and by any medium, sign up to a service, share information via the Website's social media functions, or report a problem with the Website.

We collect this personal information from you either directly, such as when you contact us via our Website or indirectly, such as your browsing activity while on our Website (see 'Cookies' below).

We collect data that is specifically and voluntarily provided by a visitor to our Website. In most circumstances, this data includes limited identifiable information. Where we store any information collected via our Website we will ensure that it is adequately protected.

We may ask you to provide sensitive personal data from time to time which may include data relating to health conditions. If such data is requested, you will be given additional information as to why the sensitive personal data is being requested and how it will be used, often this will be required to provide you with our services.

We may retain a record of any contact you make with us.

The personal information we collect about you depends on the particular activities carried out through our Website. Such information includes:

- your name, address and contact details;
- special category data such as health information when engaging with us for the provision of an 'off-site' training day;
- details of any feedback you give us by phone, email, post or via social media; and
- information about the services we provide to you.

Personal information about other individuals

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- give consent on his/her behalf to the processing of his/her data;
- receive on his/her behalf any data protection notices;
- give consent to any transfer of his/her data.

Information from third parties

Occasionally we may receive information about you from other sources, which will be added to the information already held about you in order for us to help supply our services and products to you.

Information that will be collected automatically

Cookies: We may monitor your use of the Website through the use of cookies and similar tracking devices. For example, we may monitor how many times you use the Website, which pages you go to and traffic data. This information helps to build a profile of users to the Website. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually. For further information on the use of cookies on the Website, please see the sections on cookies below.

How your personal data will be used

We use this personal information to:

- create and manage your account with us;
- verify your identity;
- enquire for further information;
- provide our services to you;
- administration;
- fraud prevention and detection;
- customise our Website and its content to your particular preferences;
- notify you of any changes to our Website or to our services that may affect you;
- improve our services

Our legal basis for processing your personal information

When we use your personal information, we are required to have a legal basis for doing so. There are various different legal bases upon which we may rely, depending on what personal information we process and why.

The legal bases we may rely on include:

- **consent:** where you have given us clear consent for us to process your personal information for a specific purpose;
- **contract:** where our use of your personal information is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract;

- **legal obligation:** where our use of your personal information is necessary for us to comply with the law (not including contractual obligations);
- **legitimate interests:** where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal information which overrides our legitimate interests).

Disclosure of your personal data

We may disclose your personal data to:

- other companies that become partners or part of a group with Sevenhill Group;
- a third party who acquires Sevenhill Group or acquires substantially all of its assets, in which case the personal data shall be one of the acquired assets;
- our agents and service providers;
- law enforcement and regulatory agencies in connection with any investigation to help prevent unlawful activity or as otherwise required by applicable law;
- our clients when as part of a contracted service such as collating data sets collected from surveys

Our Website does not collect or compile personally identifying information for dissemination or sale to outside parties for consumer marketing purposes, or host mailings on behalf of third parties.

Transfer of your information out of the EEA

Your personal information may be transferred to third party service providers who process information on Sevenhill Group's behalf, including providers of information technology, identity management, Website hosting and management, data analysis, data back-up, security and storage purposes. As a result, your personal data may be transferred outside of the country where you are located, including outside of the European Economic Area (**EEA**). Where we use data servers that may transfer data out of the EEA we will take steps to ensure adequate protections are in place to ensure the security of your information and give you remedies in the unlikely event of a security breach.

Please note that we review all processors we utilise and ensure that there are adequate safeguards in place to protect your personal data, such as adherence to binding corporate rules or compliance with the **EU-US Privacy Shield Framework**, which is a mechanism that

ensures compliance with EU data protection requirements when transferring personal data from the European Union to the United States. You can learn more about Privacy Shield here: <https://www.privacyshield.gov/welcome>

If you would like further information regarding the transfer of your information out of the EEA please contact our Data Protection Officer using the details provided in the 'How to contact us' section below.

Use of cookies

A cookie is a small text file which is placed onto your computer (or other electronic device) when you access the Website. We use cookies and other online tracking devices on the Website to:

- recognise you whenever you visit the Website;
- obtain information about your preferences, online movements and use of the internet;
- carry out research and statistical analysis to help improve the Website content, products and services and to help us better understand our visitor and customer requirements and interests; and
- make your online experience more efficient and enjoyable

The information we obtain from the use of cookies will not usually contain your personal data. Although we may obtain information about your device such as your IP address, your browser and/or other internet log information, this will not usually identify you personally. In certain circumstances we may collect personal information about you, but only where you voluntarily provide it (eg by completing an online form).

In most cases we will need your consent in order to use cookies on this Website. The exception is where the cookie is essential in order for us to provide you with a service you have requested.

Description of cookies

The cookies that we utilise on our Website are placed to fulfil such functions as allowing visitors to share content with a range of networking and sharing platforms, analysing how you use the Website and giving you a better more personalised experience.

Our Website uses the following cookies:

- **Session cookies** expire at the end of your browser session and allow us to link your actions during that particular browser session.
- **Persistent cookies** are stored on your device in between browser sessions, allowing us to remember your preferences or actions across multiple sites.

Some of the cookies we utilise on our Website include:

Cookie Name	Cookie Description
_ga	Definition: Used to distinguish users Source: Google Analytics Duration: 2 years
_gid	Definition: Used to distinguish users Source: Google Analytics Duration: 24 hours
_gat	Definition: Used to throttle request rate Source: Google Analytics Duration: 1 minute

How to turn off cookies

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of the Website. For further information about cookies and how to disable them please go to: www.aboutcookies.org or www.allaboutcookies.org.

Marketing

If you have provided your consent to receive news, special offers or promotions from us, we may contact you by mail, telephone and email, about our products, services, promotions, special offers and charitable causes that may be of interest to you.

The Website may contain links to other websites or apps which we or our partners own, or websites or apps of our partners or third parties. Please note that if you follow any of these links, the websites, apps and services provided through them will have their own privacy policies/terms of use. We do not accept any responsibility or liability for their respective privacy policies/terms of use or the collection and use of any personal data collected through these websites, apps or services. Please ensure that you review the relevant privacy policies/terms of use prior to providing any personal data to, or using these websites, apps and services.

Monitoring

We may monitor and record communications with you (such as telephone conversations and emails) for the purpose of quality assurance, training, fraud prevention and compliance.

Your Rights

We will collect and store information about you, as detailed above. You will be provided with opportunities to consent to this Privacy Policy and marketing when you provide your personal details to us.

You can change your mind or remove or add your consent at any time.

- You have the **right of access** to your personal records or other information that we hold about you. There is no administrative charge for this service.
- You have the **right to rectify any errors** in the data we hold about you. If any data or information we hold about you is inaccurate, or out of date, please contact us and we will correct this immediately.
- You may have the **right to have the data we hold about you erased**.
- If you wish us to continue to store your information but **wish us to keep your data separate** and not process it in any way, please let us know.

- You have the right to ask us to **stop processing your personal data for direct marketing purposes**. You may also specify that you object to direct marketing by particular channels such as by email or telephone. If this is the case, please specify the channels you are objecting to in your communications with us.
- You have the **right to data portability**. If you wish to obtain your data for your own purposes across different services, we will provide this information to you in a CSV file. There is no administrative charge for this service.

To revise your consent, access, amend or remove your records or assert any of your rights set out above, you should send your request in writing to us at enquiries@sevenhill-group.com

You may need to provide proof of identity and address (eg a copy of your driving licence or passport, and a recent utility or credit card bill); and specify the personal data you want access to, amended or removed.

How long we will store your data

We will store your data for as long as necessary for the purpose of processing. The data may be deleted in the following circumstances:

- you have withdrawn your consent to data processing;
- the original purpose for processing the data is no longer relevant or cannot be performed any more;
- the data is no longer up to date or accurate; or
- where we no longer have a reason to store your data as determined by our Data Retention Policy.

Children

We do not contract directly with children and therefore, we do not actively process the personal data of children. In using our services, you confirm that you have read and consented to this Policy and verify that you are over the age of 18.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We also confirm that your data will be stored on secure servers.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

Concerns and Questions

We hope that we can resolve any query or concern you raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

Changes to this Privacy Policy

We may change this Policy from time to time. You should check this policy frequently to ensure you are aware of the most recent version that will apply each time you use the Website.

How to contact us

Please contact us if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact us, please send an email to enquiries@sevenhill-group.com, write to Sevenhill Group, Foxley Barn, Church Road, Tadley, RG26 3AU or call 0118 982 0603.