

1 Introduction

- 1.1 This privacy policy ('Policy') relates to the website at www.capital-people.co.uk any subdomain or any such related website ('Website').
- 1.2 By accessing or using the Website or instructing us to carry out services for you, you agree to comply with and be bound by this Policy. Please read this Policy carefully as it contains important information about how we will use your personal data (as defined below).
- 1.3 In certain circumstances (as set out below) you will be required to indicate your consent to the processing of your personal data when you first submit information to us (whether via the Website or other means). For further information please see Section 4 below.
- 1.4 We may update this Policy from time to time. If we change this Policy we will post the changes on this page, and place notices on other pages of the Website as applicable, so that you may be aware of the personal data we collect and how we use it. This Policy was last updated in April 2021

2 Information about us

- 2.1 The terms 'Capital People' or 'us' or 'we' refer to Capital People Consultants Limited a company registered in England and Wales (under company number 04096994) and having its registered office at Capital Building, Tyndall Street, Cardiff, CF10 4AZ. The term 'you' refers to the individual accessing and/or submitting personal data to us or via the Website.
- 2.2 We act as Data Controller and are responsible for, "and control the processing of, your personal data in accordance with the Data Protection Requirements. Our contact details are set out below under 17.3..

3 Terms used in this Policy

- 3.1 References in this Policy to:

'Data Protection Requirements' means all applicable data protection and privacy legislation in force from time to time in the UK including the General Data Protection Regulation ((EU) 2016/679); the Data Protection Act 2018; the Privacy and Electronic Communications Directive 2002/58/EC (as updated by Directive 2009/136/EC) and the Privacy and Electronic Communications Regulations 2003 (SI 2003 No. 2426) as amended; any other European Union legislation relating to personal data and all other legislation and regulatory requirements in force from time to time which apply to a party relating to the processing of Personal Data (including, without limitation, the privacy of electronic communications); and the guidance and codes of practice issued by the Information Commissioner or any other supervisory authority, and the equivalent of any of the foregoing in any relevant jurisdiction. **'personal data'**, **'Data Controller'**, **'special category data'** and **'processing'** shall have the meanings given to them in the Data Protection Requirements. **'personal data'** has a legal definition under the Data Protection Requirements but, in brief, it refers to information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier. Such information must be protected in accordance with applicable Data Protection Requirements.

'special category data' has a legal definition under the Data Protection Requirements but, in brief, refers to information relating to an identifiable person's religion, sexuality, disability, political beliefs or health and will include details of any trade union membership.

4 Personal data we may collect about you

- 4.1 When you use the Website, instruct us to carry out services for you, attend our events, contact us or otherwise deal with us we may collect the following information about you:
- 4.1.1 personal information such as your name, address, email address and telephone number;
 - 4.1.2 payment and bank account details;
 - 4.1.3 information regarding your job title and work contact details;
 - 4.1.4 opinions and any other information you may supply via surveys, comment boxes or feedback forms;
 - 4.1.5 technical information including IP address, operating system, browser type and related information regarding the device you used to visit the Website, the length of your visit and your interactions with the Website; and
 - 4.1.6 details of any enquiries made.
- 4.2 We may also obtain special category data about you if you instruct us to carry out service for you or during the course of providing those services. If you volunteer such information, you will be asked to consent to our processing of it for the purposes we inform you of.
- 4.3 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 visit, which pages you go to, traffic data, log in information, browser type and version, browser plug in types, operating system and platform, page response times, download errors, page interaction information (such as scrolling, clicks, and mouseovers), location data, the originating domain name of your internet service provider and the time and date that that information is requested. This information helps us to build a profile of our users. 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 our use of cookies, please see below or our Cookie policy.
- 4.4 Occasionally we may receive information about you from other sources, for example any from any third party websites and applications that integrate or communicate with the Website in relation to you. If so, we will add this information to the personal data we already hold about you in order to help us carry out the activities listed below.

5 How long we keep your personal data

- 5.1 Subject to the below, we will keep your personal data only for the purposes set out in the table below for:
- 5.1.1 where you have instructed us to carry out services for you we will keep the information for a period of at least 7 years from the date we close your file. Please see our [terms and conditions](#) for more information on file retention;
 - 5.1.2 if you have not instructed us to carry out services for you but have provided information to us at an event and have consented to our keeping in touch with you then we will keep your information for a period of 3 years or until you withdraw your consent or tell us that you would no longer like to receive information from us. We will contact you each year to ask you to confirm that your details are up to date.
- 5.2 We may keep your data for a longer period of time than is stated above if we are legally required to do so.

6 The purpose and legal basis for the processing

Under applicable Data Protection Requirements we will only process your personal data if we have a “legal basis” (i.e. a	2 The legal basis for our doing so
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<p>legally permitted reason) for doing so. For the purposes of this Policy, our legal basis for processing your personal data, and the reasons that we process your personal data, are set out in the table below.</p> <p>1 How we use your personal data</p>	
<p>If you have instructed us to act on your behalf - to provide services to you in accordance with your instructions, this will include billing you.</p>	<p>The performance of a contract to which you are a party or in order to take steps at your request prior to entering into that contract.</p>
<p>To operate, administer, maintain, provide, analyse and improve the Website and the services available through the Website</p>	<p>Subject to your rights set out below under the heading 'Your rights', the legitimate interest of providing services to users through the Website, which requires the processing of your personal data to enable us to provide these services.</p> <p>This processing is necessary for the legitimate interests we pursue.</p>
<p>To communicate with you and provide you with information concerning updates that we believe will be of interest to you.</p>	<p>Subject to your rights set out below under the heading 'Your rights', the legitimate interest of providing services to you as a law-firm by keeping you up to date with legal changes that may be of interest to you, which requires the processing of your personal data to enable us to provide these services.</p>
<p>To investigate and address any comments, queries or complaints made by you regarding the Site, and any similar or related comments, queries or complaints from other users.</p>	<p>Subject to your rights set out below under the heading 'Your rights', the legitimate interest of providing services to our users through the Website, which requires the processing of your personal data to enable us to provide these services.</p>
<p>For administration, maintenance and improvements of the Website and/or our services.</p>	<p>Subject to your rights set out below under the heading 'Your rights', the legitimate interest of providing services to our users through the Website or otherwise, which requires the processing of your personal data to enable us to provide these services.</p>
<p>To contact you for marketing purposes (see the information under 'Marketing and opting out' below).</p>	<p>We send out marketing communications based on our legitimate interests of providing professional services. The method of communication may vary as set out below:</p> <ul style="list-style-type: none"> — we may send you information via post or, if you are dealing with us on behalf of a limited company or LLP, to your corporate email address; — we will only contact you via your personal email address for marketing purposes if: <ul style="list-style-type: none"> (i) you have given your consent (see 'Marketing and opting out' in clause 8 below); or

	<p>(ii) you have previously bought goods and services from us and we are contacting you to let you know about similar goods and services that we offer (see 'Marketing and opting out' in clause 8 below).</p> <p>You have the right at any time to let us know that you no longer wish to receive marketing communications from us.</p>
To notify you about changes to our services or the Website.	Subject to your rights set out below under the heading ' Your rights ', the legitimate interest of providing services to our users through the Website or otherwise, which requires the processing of your personal data to enable us to provide these services.
To ensure that content from the Website is presented in the most effective manner for you and for your device and customising the Website and its content to your particular preferences.	Subject to your rights set out below under the heading ' Your rights ', the legitimate interest of providing services to our users through the Website, which requires the processing of your personal data to enable us to provide these services.
To allow you to participate in interactive features of the Website, including inputting information and providing feedback.	Subject to your rights set out below under the heading ' Your rights ', the legitimate interest of providing services to our users through the Website, which requires the processing of your personal data to enable us to provide these services.
To conduct research, statistical analysis and behavioural analysis (including anonymizing data for these purposes).	Subject to your rights set out below under the heading ' Your rights ', the legitimate interest of providing services to our users through the Website or otherwise, which requires the processing of your personal data to enable us to provide these services.
To disclose your information to selected third parties as permitted by this Policy.	Your consent where given separately for that particular purpose.
To comply with our legal obligations, including obligations relating to the protection of Personal Data.	Where required by (but not limited to) any request or order from law enforcement agencies and/or HMRC in connection with any investigation to help prevent unlawful activity.

7 Your consent to processing

- 7.1 As noted above, you will be required to give consent to certain processing activities before we can process your personal data as set out in this Policy. Where applicable, we will seek this consent from you when you first submit personal data to us.
- 7.2 If you have previously given consent you may freely withdraw such consent at any time. You can do this through your account on the Website or by notifying us in writing (see 'Marketing and opting out' below).
- 7.3 If you withdraw your consent, and if we do not have another legal basis for processing your information (as set out above), then we will stop processing your personal data. If we do have

another legal basis for processing your information then we may continue to do so subject to your legal rights (for which see information under 'Your Rights' below).

- 7.4 Please note that if we need to process your personal data in order to operate the Website and/or provide our services, and you object or do not consent to us processing your personal data, the Website and/or those services may not be available to you.

8 Marketing and opting out

- 8.1 We strive to provide you with choices regarding certain personal data uses particularly around marketing and advertising. Where you have previously instructed us to provide services to you or purchased other services from us then we may contact you by telephone, email and post about similar or related products, services, promotions and special offers that may be of interest to you. We will inform you (during the sale process) if we intend to use your data for such purposes and give you the opportunity to opt-out of receiving such information from us. In addition, and if you have given permission, we may also contact you by telephone and email about our other products, services, promotions and special offers that may be of interest to you. We will inform you (before collecting your data) and seek your permission if we intend to use your data for such additional marketing purposes. If you prefer not to receive any direct marketing communications from us, or you no longer wish to receive them, you can opt out at any time (see below).
- 8.2 You have the right at any time to ask us, or any third party, to stop processing your information for direct marketing purposes. If you wish to exercise this right, you should contact us by sending an email to info@capital-people.co.uk, or contact the relevant third party using their given contact details, giving us or them enough information to identify you and deal with your request. Alternatively, you can follow the unsubscribe instructions in emails you receive from us or them.

9 Disclosure of your personal data

- 9.1 We may disclose your personal data to:
- 9.1.1 Capital Law and People Limited which is an associated company of ours who provides us with administration services;
 - 9.1.2 Capital Law Limited which is an associated company of ours who provide legal services to clients in conjunction with us. We will always tell you if any services are being provided by Capital Law Limited. For more information on Capital Law Limited please see their website at www.capital-law.co.uk.
 - 9.1.3 our agents and outsourced service providers or third-party contractors to enable them to undertake services for us and/or on our behalf (and we will ensure they have appropriate measures in place to protect your personal data);
 - 9.1.4 if we are under a duty to disclose or share Personal Data in order to comply with any legal obligation, including (but not limited to) any request or order from law enforcement agencies and/or HMRC in connection with any investigation to help prevent unlawful activity;
 - 9.1.5 to any prospective buyer or seller (and their representatives) in the event that we sell or buy any business or assets.
- 9.2 We may disclose aggregated, anonymous information (i.e. information from which you cannot be personally identified), or insights based on such anonymous information, to selected third parties, including (without limitation) analytics and search engine providers to assist us in the improvement and optimisation of the Website. In such circumstances we do not disclose any information which can identify you personally.

10 Keeping your personal data secure

We, our business partners or outsourced service providers referred to above will use technical and organisational measures to safeguard your personal data. While we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not

entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred from you or to you via the internet.

11 Third Party Websites

Our Website may, from time to time, contain links to and from the websites of our partner networks, advertisers, affiliates and others. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

12 Information about other individuals

If you give us information on behalf of someone else, you can 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 personal data;
- receive on his/her behalf any data protection notices;
- give consent to the transfer of his/her personal data abroad.

13 Transfers of personal data outside of the EEA

From time to time we may need to transfer your personal data out of the UK to the EU or countries outside the European Economic Area, which comprises the EU member states plus Norway, Iceland and Liechtenstein (“EEA”).

Such countries may not have similar protections in place regarding protection and use of your data as those set out in this Policy. Therefore, if we do transfer your personal data out of the UK to countries outside the EEA we will take reasonable steps in accordance with applicable Data Protection Requirements to ensure adequate protections are in place to ensure the security of your personal data including:

- use of approved contractual clauses;
- ensuring that we only transfer your personal data to persons or entities that are appropriately authorised and/or accredited to process personal data in compliance with applicable Data Protection Requirements;
- By submitting your personal data to us in accordance with this Policy you consent to these transfers for the purposes specified in this Policy.

14 Your rights

- 14.1 If you are an individual, this section sets out your legal rights in respect of any of your personal data that we are holding and/or processing. If you wish to exercise any of your legal rights you should put your request in writing to us (using our contact details below) giving us enough information to identify you and respond to your request.

You have the right

- to request access to information about personal data that we may hold and/or process about you, including: whether or not we are holding and/or processing your personal data; the extent of the personal data we are holding; and the purposes and extent of the processing.
- to have any inaccurate information we hold about you be rectified and/or updated. If any of the personal data that you have provided changes, or if you become aware of any inaccuracies in such personal data, please let us know in writing giving us enough information deal with the change or correction.
- in certain circumstances to request that we delete all personal data we hold about you (the ‘right of erasure’). Please note that this right of erasure is not available in all circumstances,

for example where we need to retain the personal data for legal compliance purposes. If this is the case, we will let you know.

- in certain circumstances to request that we restrict the processing of your personal data, for example where the personal data is inaccurate or where you have objected to the processing (see below).
- to request a copy of the personal data we hold about you and to have it provided in a structured format suitable for you to be able to transfer it to a different data controller (the ‘right to data portability’). Please note that the right to data portability is only available in some circumstances, for example where the processing is carried out by automated means. If you request the right to data portability and it is not available to you we will let you know.
- in certain circumstances to object to the processing of your personal data. If so, we shall stop processing your personal data unless we can demonstrate sufficient and compelling legitimate grounds for continuing the processing which override your own interests. If, as a result of your circumstances, you do not have the right to object to such processing then we will let you know.
- in certain circumstances not to be subject to a decision based solely on automated processing, for example where a computer algorithm (rather than a person) makes decisions which affect your contractual rights. Please note that this right is not available in all circumstances. If you request this right and it is not available to you we will let you know.
- to object to direct marketing, for which see above.

15 Complaints

If you have any concerns about how we collect or process your Data then you have the right to lodge a complaint with a supervisory authority, which for the UK is the UK Information Commissioner’s Office (“ICO”). Complaints can be submitted to the ICO through the ICO helpline by calling 0303 123 1113. Further information about reporting concerns to the ICO is available at <https://ico.org.uk/concerns>

16 ‘Cookies’ and related software

- 16.1 Our software may issue ‘cookies’ (small text files) to your device when you access and use the Website and you will be asked to consent to this at the time (e.g. when you first visit our website). Cookies do not affect your privacy and security since a cookie cannot read data off your Website or read cookie files created by other sites.
- 16.2 Our Website uses cookies and other tracking and monitoring software to: distinguish our users from one another; collect standard Internet log information; and to collect visitor behaviour information. The information is used to track user interactions with the Website and allows us to provide you with a good experience when you access the Website, helps us to improve our Website, and allows us to compile statistical reports on Website visitors and Website activity.
- 16.3 You can set your Website not to accept cookies if you wish (for example by changing your browser settings so cookies are not accepted), however please note that some of our Website features may not function if you remove cookies from your Website. For further general information about cookies please visit www.aboutcookies.org or www.allaboutcookies.org

Contact Us

You can contact us at:

E: info@capital-people.co.uk

T: 02920 474400

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