

Privacy policy

1 Introduction

- 1.1 We, Etopia Corby Limited (**we, us, our**) take privacy, and the security of personal data, very seriously, and we are committed to ensuring that we safeguard your personal data at all times and in the best way possible.
- 1.2 This privacy policy contains important information for you. It explains:
 - 1.2.1 who we are;
 - 1.2.2 what personal information we collect about you;
 - 1.2.3 how, when and why we collect, store, use and share your personal data;
 - 1.2.4 how we keep your personal data secure;
 - 1.2.5 how long we keep your personal data;
 - 1.2.6 your rights in relation to your personal data; and
 - 1.2.7 how to contact us, or the relevant supervisory authorities, should you have a complaint.
- 1.3 In order that we can provide our products and services to you we need to collect, use, and process or deal with, certain personal information about you. When we do so we are subject to the General Data Protection Regulation (**UK GDPR**) and the [Data Protection Act 2018](#), and we are responsible as what is described as a 'controller' of that personal information for the purposes of those laws. In other words, we are primarily responsible for that data, and are the 'natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data'.
- 1.4 If you have any questions about the use to which we put your data, please email us at sales@etopiacorby.co.uk, or write to Stephen Avila, the data protection officer, at 3rd Floor, Millbank Tower, Millbank, London, England SW1P 4QP.
- 1.5 This policy applies in all circumstances where we are acting as a data controller in relation to the personal data of our customers, our employees and agents, our website visitors and our service users. That is to say, it applies where we have a supervisory role in relation to how personal data is collected, stored, used and shared.
- 1.6 We are committed to preserving the privacy of your data so that we can:
 - 1.6.1 supply products and deliver services of a high quality to customers;

- 1.6.2 at all times comply with the law and the various regulations that we are subject to;
- 1.6.3 meet the expectations of customers, employees and third parties; and
- 1.6.4 protect our reputation.
- 1.7 In this policy, please note the use of the following terms:
- personal data** has the meaning given to it by the UK GDPR and means any information relating to an identified or identifiable individual (known as a 'data subject');
- processing** means any operation or actions performed on personal data; for example collection, recording, organisation, structuring, storing, altering, deleting or otherwise using personal data;
- we, us and our** refers to Etopia Corby Limited and its directors;
- you and your** refers to the person whose data is processed.

2 Your personal data

- 2.1 We may collect, store, use and share personal data relating to you in the course of delivering our products and services. The data we will need to collect from you in order for us to be able to provide you with our products and services may include the following:
- 2.1.2 Your name and contact details including address, telephone number, mobile telephone number and email address.
- 2.1.2 Information about your gender where it is relevant, and you choose to provide this information.
- 2.1.3 Where you are located where it is relevant, and you choose to provide this information.
- 2.1.4 Information about your online presence (for example LinkedIn, Twitter), whether you have linked to us or our Facebook or LinkedIn page where it is relevant, and you choose to provide this information.
- 2.1.5 Professional or trade-related information where it is relevant, and you choose to provide this information.
- 2.1.6 Information required by us in order to enable us to check and verify your identity (for example for anti-money laundering purposes or generally as a means of helping to prevent fraud). This may include passport details, driv-

- ing licence details, date of birth and documents providing proof of address such as utility bills.
- 2.1.7 Information as to the matter concerning which we are supplying our products and providing our services.
 - 2.1.8 Information required by us in order to carry out a financial or credit check.
 - 2.1.9 Financial details relating to you, including details of your bank account if money is, or is likely to need to be, sent to you, billing information and credit card details.
 - 2.1.10 The source of any funds being supplied by you in relation to any transaction that involves a purchase.
 - 2.1.11 Further processing for archiving purposes.
- 2.2 Note that failure to provide the personal data requested may delay the supply of our products and provision of services.
- 2.3 In most cases we will collect data about you directly from you by letter, by email, using a secure portal on our website, by phone or at a meeting with you. However, we may also need to acquire information about you:
- 2.3.1 from publicly-available sources such as HM Land Registry, Companies House, professional records and other membership records;
 - 2.3.2 from third-party services such as screening suppliers, credit reference agencies and due diligence suppliers;
 - 2.3.3 from third parties with whom you have a relationship, including banks, building societies, financial institutions, other professionals and advisers, employers, professional bodies, doctors and trade unions;
 - 2.3.4 through information technology-related methods, including cookies on websites, CCTV, messaging systems, access control systems, email and instant messaging services.
- 2.4 Please note that 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.

3 **The purposes for which your information is used**

- 3.1 Data protection law requires that we only use your personal data for the purposes for which it was acquired, or where we have a proper reason for using it. Those reasons may include the following:

- 3.1.1 Where you have given consent to the use of your personal data for one or more specific purposes.
 - 3.1.2 Where the use is necessary for the performance of a contract to which you are party, or in order to take steps at your request prior to entering into a contract.
 - 3.1.3 Where the use is necessary for compliance with a legal obligation that we are subject to.
 - 3.1.4 Where the use is necessary in order to protect your vital interests or those of another person.
 - 3.1.5 Where the use is necessary for the performance of a task carried out in the public interest, or in the exercise of official authority vested in us.
 - 3.1.6 Where the use is necessary for the purposes of our legitimate interests or those of a third party, except where those interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data, in particular where you or the relevant person is a child.
- 3.2 The reasons set out above represent the general position as to the purposes for which data may be used. The specific position in relation to your personal data, however, is that we may use it for the following purposes⁷:
- 3.2.1 To provide our products and services to you so that we can comply with our contract with you or take any steps that it is necessary for us to take before entering into a contract with you.
 - 3.2.2 To prevent or detect fraud, either against you or against any other person involved in any matter in which you are involved. This will help to prevent any damage either to you, a third party, or to us.
 - 3.2.3 To carry out identity checks, and to undertake information gathering and audits, as required by regulatory bodies to comply with any legal and/or regulatory obligations to which you or we are subject.
 - 3.2.4 To undertake financial, embargo/sanction list and other security checks, and such other processing activities as are required for legal and regulatory compliance generally or specifically by your, or our, regulators.
 - 3.2.5 To gather and provide any information required by, or relating to, audits, enquiries or investigations by your, or our, regulators.
 - 3.2.6 To comply with our internal business policies, and for operational reasons such as security, confidentiality, competency and efficiency control, training and customer care. This will help us to deliver the best products and services to you.

- 3.2.7 For audits and external quality reviews in relation to standards adopted by us (for example ISO standards, professional standards etc).
 - 3.2.8 For statistical analysis to enable us better to manage our business; for example in relation to our financial performance, customer base and product range.
 - 3.2.9 For maintaining and updating records to ensure accuracy of processing.
 - 3.2.10 To comply with legal and regulatory obligations to make information returns to regulators and legally-constituted bodies.
 - 3.2.11 To ensure safe working practices, and for staff administration and assessment purposes.
 - 3.2.12 For marketing our services and those of selected third parties if agreed to by you to existing and former customers and third parties.
 - 3.2.13 For credit control and credit reference checks in relation to the services we perform.
- 3.3 The purposes set out above will not apply to what is termed 'special category personal information'. This includes personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic and biometric data capable of identifying you, and data concerning health, sex life or sexual orientation. We will only ever process information of that nature with your explicit consent.

4 **Contacting you**

- 4.1 In addition to the general matters dealt with in paragraph 3.2 above, we may also need to send you updates concerning our products and services, and about relevant developments in relation to you, our products and services, or other related matters which might concern you or be of interest to you. This may be by post, telephone, email or text, and may include information about the products and services we offer, and information relating to changes in those products and services.
- 4.2 We regard ourselves as having a legitimate interest in processing your personal data for these purposes, and we take the view that we do not require your consent in order to do so. From time to time we undertake what are known as 'legitimate interest assessments' in order to balance our interests in contacting you with your interests in relation to your data. Where we believe that consent is required, we will contact you specifically for this, and will do so in a clear and transparent manner.

- 4.3 Where you have agreed to us doing so we may also send you information about third party products and services in which you have expressed an interest, or which are relevant to any products and services that we have supplied.
- 4.4 Be assured that we treat your personal data with the utmost respect and will never share it with others for marketing or promotional purposes. You have, at all times, the right to request that we do not contact you for any purpose other than supplying our products and providing our services. We may however require that you confirm your marketing preferences from time to time so that we can be sure that your views remain the same, especially in relation to issues such as legal and regulatory updates.

5 **Sharing your data with others**

- 5.1 Notwithstanding the fact that we will not share your personal data for marketing purposes, it may be necessary for us to share your personal data with others in order to supply our products to you and perform our services for you, to comply with our contractual obligations to you, to comply with our legal or regulatory obligations to you, or to comply with any contractual, legal or regulatory obligations that we are subject to. These may include:
- 5.1.1 professional advisers used in connection with the products and services in relation to which we are instructed (eg accountants, advisors, experts, barristers, solicitors, medical professionals, designers, printers, manufacturers, installers and delivery companies;
 - 5.1.2 third parties involved in the matter which we are dealing with, such as financial services providers, banks, building societies, registrars;
 - 5.1.3 government and similar organisations such as HM Land Registry, Companies House, HM Revenue and Customs;
 - 5.1.4 others within our business;
 - 5.1.5 your/our regulators;
 - 5.1.6 credit reference agencies in connection with our contract with you;
 - 5.1.7 our bank, insurers and insurance brokers;
 - 5.1.8 external auditors in relation to the audits and external quality reviews referred to above; and
 - 5.1.9 suppliers of services required in relation to our products and services.
- 5.2 When sharing your personal data, we will ensure at all times that those with whom it is shared process it in an appropriate manner, and take all necessary measures in order to protect it. We will only ever allow others to handle your personal data if we are satisfied that their measures to protect your personal data are satisfactory.

- 5.3 Please be aware that, from time to time, we may be required to disclose your personal data to, and exchange information about you or relating to you with, government, law enforcement and regulatory bodies and agencies in order to comply with our own legal and regulatory obligations.
- 5.4 During the course of, and sometimes following the conclusion of, our supply of products to you and provision of services to you we may need to share your personal data with other third parties, for example those involved in a relevant or related transaction. We will only share that information which it is necessary and relevant to share.
- 5.5 We may also need to share some personal information with other parties, such as potential buyers of some or all of our business, or during a re-structuring. Usually, information will be anonymised, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.
- 5.6 From time to time it may be necessary for us to share data for statistical purposes (for example with our regulatory body). We will always take steps to try to ensure that information shared is anonymised, but where this is not possible we will require that the recipient of the information keeps it confidential at all times.

6 **How your personal data is kept**

- 6.1 Your personal data will be kept secure at all times.
- 6.2 Your personal data may be held at our offices, at third party agencies and service providers, and by our representatives and those agents used by us
- 6.3 Some of your data may be held by electronic methods for storing data such as cloud storage with appropriate industry standard safeguards for storing it. Where this takes place outside the UK then the provisions set out in Paragraph 7 below apply.
- 6.4 We operate various security measures in order to prevent the loss of, or unauthorised access to, your personal data. We restrict access to your personal data to those with a genuine business need to access it, and we 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.
- 6.5 In addition, we take the following steps to protect your personal data: e.g. encryption and other online security measures.
- 6.6 Personal data that is processed by us will not be retained for any longer than is necessary for that processing, or for purposes relating to or arising from that processing.
- 6.7 Where your personal data is retained after we have finished providing our products and services to you, or where the contract with you has ended in any other way, then this will generally be for one of the following reasons:

- 6.7.1 so that we can respond to any questions, complaints or claims made by you or on your behalf;
 - 6.7.2 so that we are able to demonstrate that your matter was dealt with adequately, and that you were treated fairly;
 - 6.7.3 in order to comply with legal and regulatory requirements.
- 6.8 In general, we will only retain your data for so long as is necessary for the various objectives and purposes contained in this policy. Please note, however, that different periods for keeping your personal data will apply depending upon the type of data being retained and the purpose of its retention.
- 6.9 We will retain your personal data as follows:
- 6.9.1 We will only retain your personal data for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, financial, accounting or reporting requirements.
 - 6.9.2 Contact details are retained so that we can inform you of updates concerning our products and services, and about relevant developments in relation to you, our products and services or other related matters which might concern you, or be of interest to you.
 - 6.9.3 In order to protect your vital interests, or the vital interests of another natural person.
- 6.10 We may anonymise any personal data which it is no longer necessary for us to retain for use in research or for statistical purposes and may use this information indefinitely without further notice to you.

7 **Transferring your data outside the UK**

- 7.1 In order for us to provide you with the products and services for which we have been instructed, it may be necessary for us to share your personal data with those who are outside the UK where, for example, those persons have offices outside the UK, are based outside the UK, where electronic services and resources are based outside the UK, or where there is an international element to the instructions we have received from you. Where this is the case, special rules apply to the protection of your data.
- 7.2 It may be necessary, during the course of your transaction, for us to transfer personal data relating to you to one or more of the countries which have been assessed by the Secretary of State as providing an adequate level of protection for personal data.
- 7.3 We may also need to transfer your personal data to non-EEA countries that have not been assessed by the Secretary of State as providing adequate protection. In such cases we will

always take steps to ensure that, wherever possible, the transfer complies with data protection law, and that your personal data will be secure. We use standard data protection contract clauses which have been approved by the Secretary of State in such circumstances.

7.4 For further information please [contact us](#).

8 Your rights in relation to your data

8.1 Data protection legislation gives you, the data subject, various rights in relation to your personal data that we hold and process. These rights are exercisable without charge, and we are subject to specific time limits in terms of how quickly we must respond to you. Those rights are, in the main, set out in Articles 12–23 of the UK GDPR. They are as follows:

8.1.1 **Right of access**— the right to obtain, from us, confirmation as to whether or not personal data concerning you is being processed and, where that is the case, access to that personal data and various other information, including the purpose for the processing, with whom the data is shared, how long the data will be retained, and the existence of various other rights (see below).

8.1.2 **Right to rectification**— the right, without undue delay, to have inaccurate personal data concerning you put right.

8.1.3 **Right to erasure**— sometimes referred to as the ‘right to be forgotten’, this is the right for you to request that, in certain circumstances, we delete data relating to you.

8.1.4 **Right to restrict processing**— the right to request that, in certain circumstances, we restrict the processing of your data.

8.1.5 **Right to data portability**— the right, in certain circumstances, to receive the personal data which you have provided to us in a structured, commonly used and machine-readable format, and the right to have that personal data transmitted to another controller.

8.1.6 **Right to object**— the right, in certain circumstances, to object to personal data being processed by us where it is in relation to direct marketing, or in relation to processing supported by the argument of legitimate interest.

8.1.7 **Right not to be subject to automated decision making**— a right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

8.2 Full details of these rights can be found in the UK GDPR by reference to guidance produced by the Information Commissioner’s Office.

- 8.3 In the event that you wish to exercise any of these rights you may do so by:
- 8.3.1 Contacting us using any medium you wish, including in writing, by telephone, by text, electronically, or using such social media as we employ for communication purposes.
 - 8.3.2 By completing a form which we can supply to you for this purpose.
 - 8.3.3 Through a third-party whom you have authorised for this purpose.

9 **Keeping your data secure**

- 9.1 In order to ensure that data is kept secure, and to prevent there being any breach of confidentiality, we have put in place security measures which are intended to prevent your personal data from being accidentally lost or used or accessed unlawfully. Access to your personal data is restricted to those with a need to access it, and regard will be had to the need for confidentiality when that personal data is processed.
- 9.2 Our systems are subject to rigorous testing, and we observe industry standards for information security.
- 9.3 In the event that there is a suspected data security breach you will be notified. We will also inform the appropriate regulator (including the Information Commissioner's Office) of a suspected data security breach, where we are legally required to do so.

10 **Making a complaint**

- 10.1 If you have any queries as to the acquisition, use, storage or disposal of your personal data, please [contact us](#).
- 10.2 We can be contacted at the details provided at 1.4 above, or via this [website](#).
- 10.3 Notwithstanding our best efforts, inevitably sometimes things do go wrong. If you are unhappy with any aspect of the use and/or protection of your personal data, you have the right to make a complaint to the Information Commissioner's Office, who may be contacted in writing at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF; by telephone on 0303 123 1113; by fax on 01625 524510 or online at www.ico.org.uk.

11 **This policy**

- 11.1 This privacy policy was published on 26/01/21.
- 11.2 The terms and provisions of this privacy policy may be changed, updated and amended from time to time. If we do so during the time when we are providing you with products and services we will inform you of those changes.
- 11.3 If you would like this policy to be supplied to you in another format (for example audio, large print, braille) please [contact us](#) at the address in paragraph 10.2 above.

