

Privacy Policy

This policy was last updated on: 11th May 2018

Introduction

The Contract Specialist Limited (“TCS”, “we”, “us”, or “our”) takes the privacy and security of your personal data seriously. We are committed to using your personal data ethically, responsibly, in a secure manner and in accordance with your rights as a data subject.

Personal data is any information relating to an identified or identifiable living person. TCS processes personal data for various purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose may differ. This Privacy Policy explains how we collect, use and share information about you, as well as the choices you have with respect to that information. We may use personal data provided to us for any of the purposes described in this Privacy Policy, or as otherwise stated at the point of collection. This Privacy Policy does not extend to any other websites that can be accessed from this website, such as via links or other similar means.

Throughout this Privacy Policy we have referred to our website and our commercial contracts, HR and GDPR consultancy services collectively as “Services”. When using our Services please do not provide us with any other person’s personal data unless we specifically request you to do so. However, where we have requested this for the purpose of TCS discussing or providing our Services, you must only do so where you have complied with your legal obligations under relevant data protection legislation.

Who are we?

TCS provides virtual commercial contract, HR and GDPR consultancy services as The Contract Specialist, The HR Specialist and The GDPR Specialist, all of which are trading names of The Contract Specialist Limited. The Contract Specialist Limited is registered in England and Wales under company number 08394483 and our registered office is at 63 Bartholomew Street, Newbury, Berks, RG14 7BE. We are registered on the Information Commissioner’s Office Register of Data Controllers under registration number ZA321378.

If you have any questions about this Privacy Policy, or if you need to contact us about your personal data (including amending and deleting it), you can contact us by:

- Emailing our Data Protection Officer at dataprotection@thecontractspecialist.co; or
- Telephone on 020 3633 4463.

Why do we need your personal data?

When we provide our Services to you we will need to collect and use certain information in order to be able to provide those Services efficiently and effectively. That information may include your personal data, but we will ensure that we only collect what is necessary for the purpose of delivering that Service.

What information will we collect about you and what is it used for?

We will collect the following information about you for the purpose of providing our Services to you:

- If you place an order with us for our Services, or enter into a contract with us for our Services, we may collect contact information from you (such name, job title, email address, phone number and geographical location) so that we can provide those Services efficiently and effectively to you. Our legal basis for doing so is for completing our contractual obligations to you in providing the relevant Services to you;
- We may collect your name, business and/or personal email address, contact number(s), job title, business or correspondence address and geographical location for the purpose of contacting you by email and/or phone to respond to your communications with us, including to investigate, respond to and resolve any complaints, and for security and security-related investigation purposes. Our legal basis for collecting this information is for our legitimate interests in the proper administration of our website and business;
- If you hand us your business card (for example, at a trade show) we will store your contact details in our electronic database and (unless you specified a different purpose, in which case they will be used for that purpose only) we may use them to contact you about our Services unless you tell us otherwise. Our legal basis for doing so is for our legitimate interests in resuming business communications with you;
- Personal information about website usage may be collected through the use of cookies (see section on 'Cookies' below) and server logs, which track the IP addresses of users visiting our site and the pages they visit. Our legal basis for doing so is for our legitimate interests in monitoring and improving our website and related Services, ensuring the security and integrity of our systems, managing our web system and troubleshooting problems.

Providing TCS with your personal data

Except where you have requested or have entered into a separate contract with us for TCS to provide our Services to you, you are under no legal or contractual obligation to provide your personal data to us and it is entirely at your discretion. However, if you choose not to we may be unable to provide the relevant Service to you.

Will we share the information with anyone else?

TCS will never sell your personal information, and we only share your information in the limited circumstances detailed below. Any third parties engaged by us to process your data or to provide Services on our behalf are subject to obligations to protect the privacy of your information as required under this Privacy Policy.

We may share your name, business and/or personal email address, contact number(s), job title, business or correspondence address and geographical location (including personal data contained in a business card that you may hand to us) with our third party suppliers in order for them to provide their services to us. This includes our suppliers who help us to provide our Services to you or who administer our back-office operations, including our cloud-based business operations providers (such as accounts, hosting services, cloud storage and email providers), and our professional advisors (such as our accountants and lawyers).

We may also share and disclose your information with your consent, or where the disclosure is necessary for compliance with our legal obligations.

International transfers of your personal data

There may be circumstances in which your personal data is transferred to third parties located in other countries in order to help us run our business and provide our Services to you, which may include transferring your personal data to a third country or international organisation. Where transfers of this nature take place we take steps to ensure that all personal data is adequately protected and that all such transfers are done lawfully. Where we transfer personal data to a third country or international organisation which is not determined by the European Commission as providing an adequate level of protection for personal data, these transfers will be subject to an agreement which covers the EU requirements for the transfer of personal data outside of the EU, such as the European Commission approved standard contractual clauses. The European Commission approved standard contractual clauses are available [here](#).

TCS will only transfer your personal data to the following third-party suppliers located in third countries, as detailed in the previous section. For security purposes we have not named the third party suppliers, but we are happy to provide further details upon request to dataprotection@thecontractspecialist.co where required:

- Our accounts and cloud-based back office service providers are situated in the USA but operate globally. They both implement appropriate safeguards to protect the processing of personal data under the US Privacy Shield Framework.

How long will TCS retain my personal data

Your personal data will not be kept for longer than is necessary for the purpose or purposes for which it was collected, and this period will normally be advised to you at the point of collection. However, there may be cases where it is not possible for us to specify in advance the periods for which your personal data will be retained. In those cases, we will determine the period of retention based on the period of time required to contact you and resolve your query or to complete your request, or the period of time required to provide Services requested by you (if the retention period is not already detailed in a contract between us).

TCS may also retain your personal data as permitted by legislation, such as where we need to retain your data for the establishment, exercise or defence of legal claims, or where we are required to for accounting purposes.

We operate a data retention process to ensure that personal data is regularly reviewed for compliance with these retention periods, and to ensure that any data is securely erased once the relevant retention period has ended.

How we will protect your information

We take the security of all the data we hold very seriously. We implement appropriate technical and organisational measures within our business to protect your personal data from unauthorised disclosure, loss, misuse or destruction and to ensure that we comply with our legal obligations and our own high standards. We have a framework of procedures in place covering data protection, confidentiality and security and we regularly review the measures we have in place to ensure that they continue to be appropriate and that they keep the data we hold secure. We will only work with third parties where appropriate contractual arrangements are in place to uphold these standards and to protect your data, including ensuring that the arrangements include strict provisions regarding the processing of personal data in accordance with all relevant legal and contractual obligations, and to only process the personal data on our instructions.

Where you submit your personal data for publication via our website or Services you acknowledge that this information will be available via the internet, worldwide. However, you must bear in mind that we cannot control

or prevent the use or misuse of this information by others, including where they replicate this information to other sites.

Change of business ownership/control

TCS may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of the company. Personal data provided by you, where it is relevant to any part of our business being transferred, may be disclosed to prospective purchasers and will be transferred to the new owner of that part of the business, but we will take steps to ensure that the privacy and security of your personal data continues to be protected. The new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use the data for the purposes for which it was originally supplied to us.

Automated decision-making

TCS confirms that no automated individual decision making, including profiling, is applied to the personal data that we collect from you.

What are my rights

You have certain rights over your personal data and data controllers are responsible for fulfilling these rights as determined by law. Where TCS decides how and why your personal data is collected and processed, we are the data controller. You have the following rights with respect to the personal data that you have provided to us, in our capacity as a data controller. All of these rights can be exercised by contacting us at dataprotection@thecontractspecialist.co:

- The right of access to personal data that we hold about you. You can request a copy of the subject access form that you will need to complete and return to us to obtain these details. Part of this process will require you to provide evidence of your identity. We will aim to respond to any requests for information promptly, and in any event within the legally required time limit, subject to being in receipt of satisfactory evidence of your identity and a fully completed subject access form. Further details on the process are contained in the subject access form;
- The right to request that we correct any personal data that we hold about you which is inaccurate or incomplete. Once we are informed that any personal data processed by us is no longer accurate or incomplete, we will make corrections (where appropriate) based on your updated information.
- In specific circumstances you can ask for the personal data that we hold to be deleted. If you want us to delete your personal data, please email us using the details above. You will need to include the reason(s) why you want your personal data to be deleted as there are general exclusions which may apply that mean we are not always under a legal obligation to action your request. We will inform you of any exclusions which may apply in our response.
- Where specific conditions apply, you have the right to restrict the processing of your personal data. You can request to restrict the processing of your personal data by emailing us using the details above. You will need to include the reason(s) why you want your personal data to be restricted. If your request meets the legal conditions and the processing of your personal data is restricted, we can still lawfully continue to store your personal data. There will also be specific conditions where we can continue to process it.

- In specific circumstances you have the right to receive your personal data in a structured, commonly used and machine-readable format and have the right to transmit your data to another data controller. This is known as the right to data portability. You can exercise this right by emailing us using the details above.
- The right to object to certain types of processing (including automated processing, profiling and direct marketing). If you wish to object to processing your personal data, please email us using the details above. You will need to include the reason(s) for your objections to processing your personal data as this right only applies in specific limited circumstances. If you make an objection that is permitted by law, we will cease to process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- Where we process your personal data based on consent, you have the right to withdraw consent at any time. We do not generally process personal data based on consent (as we can usually rely on another legal basis). To withdraw consent to our processing of your personal data please email us using the details above. Withdrawal of consent will not affect the lawfulness of processing your personal data before the withdrawal.
- The right to complain to the Supervisory Authority (which in the UK is the Information Commissioner's Office (ICO)) as detailed below.

About Cookies

Cookies are very small text files that are stored on your computer when you visit some websites. They are commonly used to retain settings or other features ready for your next visit. Cookies do not usually contain any information that would personally identify you, but they may be linked to the information that we store about you.

Cookies we use

When someone visits our website we collect standard internet log information and details of visitor behaviour patterns so that we can find out things like the number of visitors to the various parts of the website.

We will not associate any data gathered from our website with any personally identifying information from any source. If we do want to collect personally identifiable information through our web site, we will make it clear when we collect it and will explain what we intend to do with it.

These are all the cookies currently set on our website. Not all cookies are set by default, it depends how you interact with our site:

| Name | Hosted by | Functionality |
|--|-----------|--|
| DYNSRV (www.thecontractspecialist.co) | TSOHost | To serve information requested by the user |
| DYNSRV (thecontractspecialist.co) | TSOHost | To serve information requested by the user |

| | | |
|------|----------------|---|
| test | Cloudfront.net | To speed up delivery of requested information |
|------|----------------|---|

Managing Cookies

You can manage these cookies and decide if you want to accept or reject them by changing the settings on your browser. However please be aware that if you do decide to reject or restrict them the website might not function as intended.

Complaints

We hope that you won't ever need to, but if you do want to complain about our use of your personal data, please send an email with details of your complaint to dataprotection@thecontractspecialist.co. We will investigate your complaint and will respond to you in writing (which includes responding by email) and will resolve the matter as quickly as possible.

You can also complain directly to the Information Commissioner's Office (ICO) at <https://ico.org.uk/concerns/>. The ICO is the UK's Supervisory Authority for data protection regulation.

Amendments to this Privacy Policy

We may update this Privacy Policy from time to time by publishing a new version on our website. You should check this page from time to time to ensure that you're happy with any changes we have made. We may also notify you of changes to this Privacy Policy by email. If you do not agree with the amendments please discontinue use of our Services. Any continued use of our Services will be subject to the updated, most recent version of the Privacy Policy, as displayed on our website.

--- End of document ---