



What is the purpose of this document?

Elementary Business Consultancy (“we”, “us”, “our”), are committed to protecting your privacy and complying with our data protection obligations under the Data Protection Act 2018 (the **DPA 2018**), the UK General Data Protection Regulation 2016/679 (the **UK GDPR**) and any other applicable UK legislation (together, **Data Protection Law**).

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

What this means to you

- Further protection of your personal data
- Standardisation of the European data protection; and
- Adoption of data protection in line with technology changes

Elementary Business Consultancy is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

1. Definitions and interpretation

In this Policy, the following terms shall have the following meanings:

“Cookie”	Our website www.elementarybc.co.uk (along with nearly all other websites) uses cookies to help us provide you with the best experience possible. Cookies are tiny text files containing small amounts of information which are downloaded on your computer when you visit certain webpages. In no way do cookies harm your computer or contain any information that personally identifies you
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 of EU Regulation 2016/679 General Data Protection Regulation
“Personal data”	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to us via our website

2. Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

3. Information about us

Paul Watson is responsible for all aspects of data protection and privacy and their contact details are help@elementarybc.co.uk

4. What does this policy cover?

This privacy notice applies to how we manage your personal data collected from the website and/or during the sales process and account management purposes. Our website may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

5. Your rights

5.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

- a) The right to be informed
- b) The right of access
- c) The right to rectification
- d) The right to erasure (also known as the 'right to be forgotten')
- e) The right to restrict processing
- f) The right to data portability
- g) The right to object
- h) Rights with respect to automated decision-making and profiling.

5.2 If you have any cause for complaint about our use of your personal data, please contact Us using the details provided above and We will do our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office (ICO).

5.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

6. What data do we collect?

Depending upon your reasons for give us Your personal data, we may collect some or all of the following personal data:

- 6.1 name
- 6.2 date of birth
- 6.3 gender
- 6.4 business/company name
- 6.5 job title
- 6.6 profession
- 6.7 contact information such as email addresses and telephone numbers
- 6.8 demographic information such as post code, preferences, and interests
- 6.9 financial information such as credit / debit card numbers
- 6.10 bank account information
- 6.11 Photographs



- 6.12 IP address
- 6.13 web browser type and version
- 6.14 a list of URLs starting with a referring site, your activity on our site, and the site you exit to

7. **How do we use your data?**

- 7.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the GDPR at all times.
- 7.2 our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data (e.g. by subscribing to emails), or because it is in our legitimate interests. Specifically, we may use your data for the following purposes:
 - 7.2.1 Providing and managing your account with Elementary Business Consultancy
 - 7.2.2 Supplying our products and / or services to you (please note that we require your personal data in order to enter into a contract with you)
 - 7.2.3 Personalising and tailoring our products and / or services for you
 - 7.2.4 Replying to emails from you
 - 7.2.5 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by email)
 - 7.2.6 Market research
 - 7.2.7 Gathering feedback to enable us to continually improve our service and your customer experience
- 7.3 You will not be opted into any marketing database, should you wish to receive information about our services and to join our mailing list you will have to complete relevant consent form on our website.
- 7.4 You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it.

8. **How and where do we store your data?**

- 8.1 We only keep your personal data for as long as we need to, are legally entitled to and/or for as long as we have your permission to keep it.
- 8.2 Your data will only be stored within the European Economic Area ("the EEA").
- 8.3 Data security is very important to us, and to protect your data we have taken suitable measures to safeguard and secure data.

9. **Do we share your data?**

- 9.1 Subject to section 8.2, We will not share any of your data with any third parties for any purposes without your permission. We may ask your permission to share data with third party contractors and / or suppliers in relation to any contract we have with you.



9.2 In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority.

10. **How can you control your data?**

10.1 When you submit personal data to us, you may be given options to restrict our use of your data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and at the point of providing your details).

11. **How can you access your data?**

You have the right to ask for a copy of any of your personal data held by us (where such data is held). Please refer to our Subject Access Request Policy for more information.

12. **Contacting us**

If you have any questions about this Privacy Notice, please contact us by email at help@elementarybc.co.uk. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you.

13. **Changes to our privacy policy**

We may change this Privacy Notice from time to time (for example, if the law changes). Any changes will be updated on our website, and you will be deemed to have accepted the terms of the privacy notice unless you tell us otherwise.