

# GDPR

General Data Protection Regulation



## Policy details

**Pro** Business

Pro Business Advisors Ltd

Policy prepared by:	S.Maz
Approved by board on:	May 23rd 2018
Policy became operational on:	May 23rd 2018

# Privacy policy

& transparency for the GDPR

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# Our Privacy policy

## Summary – This Policy

This Policy explains how we may Process your Personal Data. This Policy may be amended or updated from time to time, so please check it regularly for updates.

This Policy is issued by Pro Business Advisors Ltd. (together “Company”, “we”, “us” and “our”) and is addressed to individuals outside our organisation with whom we interact, including customers, visitors to our Sites, users of our products or services (together, “you”). Defined terms used in this Policy are explained in Section at the bottom of this policy.

For the purposes of this Policy, Company is the Controller. This Policy covers the information practices relating to Company products ("Products") and Company services ("Services") offered now or in the future. Contact details are provided in the section at the bottom of this policy.

This Policy may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Data, or changes in applicable law. We encourage you to read this Policy carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this Policy.

## Summary – Collection of Personal Data

We may collect or obtain Personal Data about you: directly from you (e.g., where you contact us); in the course of our relationship with you (e.g., purchase of our services); when you register to use any of our Sites, or services; when you visit our Sites or when you interact with any third party content on a Site; when you make your Personal Data public (e.g., if you make a public post about us on social media). We may also receive Personal Data about you from third parties (e.g., law enforcement authorities).

We may collect Personal Data about you from the following sources:

- **Credentials:** We may obtain your Credential Data when you provide it to us (e.g., remote support; device access, such as login information, including passwords to perform services and support).
- **Data you provide:** We may obtain your Personal Data when you provide it to us (e.g., where you contact us via email or telephone, or by any other means, or when you provide us with your business card).
- **Relationship data:** We may collect or obtain your Personal Data in the ordinary course of our relationship with you (e.g., if you purchase a service from us).
- **Data you make public:** We may collect or obtain your Personal Data that you manifestly choose to make public, including via social media (e.g., we may collect information from your social media profile(s), if you make a public post about us).
- **Site data:** We may collect or obtain your Personal Data when you visit any of our Sites or use any features or resources available on or through a Site.
- **Registration details:** We may collect or obtain your Personal Data when you use, or register to use, any of our Sites or services.
- **Third party information:** We may collect or obtain your Personal Data from third parties who provide it to us (e.g., credit reference agencies; law enforcement authorities; etc.).

## Creation of Personal Data

We may also create Personal Data about you, such as records of your interactions with us, and details of your purchase history for internal administration purposes and analysis.

## Categories of Personal Data we may Process

### Summary – Categories of Personal Data we may Process

We may Process: your personal details (e.g., your name); demographic data (e.g., your age); your contact details (e.g., your address); records of your consents; purchase details; payment details (e.g., your billing address); information about our Sites and devices (e.g., the type of device you are using).

We may Process the following categories of Personal Data about you:

**Personal details:** given name(s); preferred name; and photograph.

**Demographic information:** gender; date of birth/age; nationality; salutation; job title/industry; and language preferences.

**Contact details:** correspondence address; telephone number; email address; and details of your public social media profile(s).

**Consent records:** records of any consents you may have given, together with the date and time, means of consent and any related information (e.g., the subject matter of the consent).

**Payment details:** invoice records; payment records; billing address; payment method; bank account number or credit card number; cardholder or accountholder name; card or account security details; card 'valid from' date; and card expiry date; BACS details; SWIFT details; IBAN details; payment amount; payment date; and records of cheques.

**Data relating to our Sites device type:** operating system; browser type; browser settings; IP address; language settings; dates and times of connecting to a Site; App usage statistics; App settings; location data, and other technical communications information (some of which may constitute Personal Data); username; password; usage data; aggregate statistical information.

**Employer details:** where you interact with us in your capacity as an employee, the contact information of your employer (including name, address, telephone number and email address) to the extent relevant.

**Views and opinions:** any views and opinions that you choose to send to us, or publicly post about us on social media platforms.

# Lawful basis for Processing Personal Data

## Summary – Lawful basis for Processing Personal Data

We may Process your Personal Data where: you have given your prior, express consent; the Processing is necessary for a contract between you and us; the Processing is required by applicable law; the Processing is necessary to protect the vital interests of any individual; or where we have a valid legitimate interest in the Processing.

In Processing your Personal Data in connection with the purposes set out in this Policy, we may rely on one or more of the following legal bases, depending on the circumstances:

**Consent:** We may Process your Personal Data where we have obtained your prior, express consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way);

**Contractual necessity:** We may Process your Personal Data where the Processing is necessary in connection with any contract that you may enter into with us;

**Compliance with applicable law:** We may Process your Personal Data where the Processing is required by applicable law;

**Vital interests:** We may Process your Personal Data where the Processing is necessary to protect the vital interests of any individual; or

**Legitimate interests:** We may Process your Personal Data where we have a legitimate interest in carrying out the Processing for the purpose of managing, operating or promoting our business, and that legitimate interest is not overridden by your interests, fundamental rights, or freedoms.

## Sensitive Personal Data

### Summary – Sensitive Personal Data

We do not seek to collect or otherwise Process your Sensitive Personal Data. Where we need to Process your Sensitive Personal Data for a legitimate purpose, we do so in accordance with applicable law.

We do not seek to collect or otherwise Process your Sensitive Personal Data in the ordinary course of our business. Where it becomes necessary to process your Sensitive Personal Data for any reason, we rely on one of the following legal bases:

**Compliance with applicable law:** We may Process your Sensitive Personal Data where the Processing is required or permitted by applicable law (e.g., to comply with our diversity reporting obligations);

**Detection and prevention of crime:** We may Process your Sensitive Personal Data where the Processing is necessary for the detection or prevention of crime (including the prevention of fraud);

**Establishment, exercise or defence of legal rights:** We may Process your Sensitive Personal Data where the Processing is necessary for the establishment, exercise or defence of legal rights; or

**Consent:** We may Process your Sensitive Personal Data where we have, in accordance with applicable law, obtained your prior, express consent prior to Processing your Sensitive Personal Data (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

# Purposes for which we may Process your Personal Data

## Summary – Purposes for which we may Process your Personal Data

We may Process your Personal Data for the following purposes: providing services to you; operating our Sites and CRM systems; communicating with you; managing our IT systems; health and safety; financial management; conducting surveys; conducting investigations where necessary; compliance with applicable law; and improving our Sites and services.

The purposes for which we may Process Personal Data, subject to applicable law, include:

**Provision of services to you:** providing our services to you; communicating with you in relation to those services, and providing you with promotional discounts at your request or in connection with those services or similar services. An out-out will be provided towards any promotional contact should you feel it's not of interest including the right to be forgotten.

**Our Sites and CRM's:** operating and managing our Sites and our CRM systems; providing information to you; communicating and interacting with you via our Sites and our CRM's; identifying issues with our Sites and CRM's and planning improvements to or creating new Sites and CRM's; and notifying you of changes to any of our Sites, our CRM's, or our services.

**Communications:** communicating with you via any means (including via email, telephone, text message, social media, post or in person) news items and other information in which you may be interested, subject to ensuring that such communications are provided to you in compliance with applicable law; maintaining and updating your contact information where appropriate; and obtaining your prior, opt-in consent where required.

**Communications and IT operations:** management of our communications systems; operation of IT security systems; and IT security audits.

**Health and safety:** health and safety assessments and record keeping; and compliance with related legal obligations.

**Financial management:** sales; finance; corporate audit; and vendor management.

**Surveys:** engaging with you for the purposes of obtaining your views on our services.

**Investigations:** detecting, investigating and preventing breaches of policy, and criminal offences, in accordance with applicable law.

**Legal proceedings:** establishing, exercising and defending legal rights.

**Legal compliance:** compliance with our legal and regulatory obligations under applicable law.

**Improving our Sites, CRM's, services:** identifying issues with our Sites, our CRM's, or our services; planning improvements to our Sites, our CRM's, or our services; and creating new Sites, CRM's, or services.

## Disclosure of Personal Data to third parties

### Summary – Disclosure of Personal Data to third parties

We may disclose your Personal Data to: legal and regulatory authorities; our external advisors; our Processors; any party as necessary in connection with legal proceedings; any party as necessary for investigating, detecting or preventing criminal offences; any purchaser of our business; and any third-party providers of acting on our behalf as part of the service, plugins or content used on our Sites.

We may disclose your Personal Data to other entities within the Company suppliers, for legitimate business purposes (including operating our Sites and our CRM, and providing services to you), in accordance with applicable law. In addition, we may disclose your Personal Data to:

**legal and regulatory authorities**, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;

**outside professional advisors** (such as accountants, auditors, solicitors or sheriffs), subject to binding contractual obligations of confidentiality;

**third party Processors** (such as payment services providers; data centres; etc.), located anywhere in the world, subject to the requirements noted below;

**any relevant party**, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal rights;

**any relevant party** for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including safeguarding against and the prevention of threats to public security;

**Any relevant third-party acquirer(s)**, in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution or liquidation);

If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Data; together with any additional requirements under applicable law.

## Data security

### Summary – Data security

We implement appropriate technical and organisational security measures to protect your Personal Data. Please ensure that any Personal Data that you send to us is sent securely.

We have implemented appropriate technical and organisational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law.

Because the internet is an open system, the transmission of information via the internet is not completely secure. Although we will implement all reasonable measures to protect your personal data, we cannot guarantee the security of your data transmitted to us using the internet – any such transmission is at your own risk and you are responsible for ensuring that any Personal Data that you send to us are sent securely.

## Data breach protocol

### **Summary – Data breach protocol**

We have procedures in place to reduce risk in the event of a data breach.

In the event of a data breach, we have a detect, lockdown, report and investigate procedure in place to ensure minimum risk.

## **Data accuracy**

### **Summary – Data accuracy**

We take every reasonable step to ensure that your Personal Data are kept accurate and up-to-date and are erased or rectified if we become aware of inaccuracies.

We take every reasonable step to ensure that:

your Personal Data that we Process are accurate and, where necessary, kept up to date; and

any of your Personal Data that we Process that you inform us is inaccurate (having regard to the purposes for which they are Processed) are erased or rectified.

## **Data minimisation**

### **Summary – Data minimisation**

We take every reasonable step to limit the volume of your Personal Data that we Process to what is necessary.

We take every reasonable step to ensure that your Personal Data that we Process are limited to the Personal Data reasonably necessary in connection with the purposes set out in this Policy or as required to provide you services or access to our CRM's and Sites.

## **Data retention**

### **Summary – Data retention**

We take every reasonable step to ensure that your Personal Data are only retained for as long as they are needed.

We take every reasonable step to ensure that your Personal Data are only Processed for the minimum period necessary for the purposes set out in this Policy.

When data has become in-active, we may retain that data for up to 7 years before its removed and securely destroyed.

The criteria for determining the duration for which we will keep your Personal Data are as follows: we will retain copies of your Personal Data in a form that permits identification only for as long as is necessary in connection with the purposes set out in this Policy, unless applicable law requires a longer retention period. In particular, we may retain your Personal Data for the duration of any period necessary to establish, exercise or defend any legal rights.

# Your legal rights

## Summary – Your legal rights

Under applicable law, you may have a number of rights, including: the right not to provide your Personal Data to us; the right of access to your Personal Data; the right to request rectification of inaccuracies; the right to request the erasure, or restriction of Processing, of your Personal Data; the right to object to the Processing of your Personal Data; the right to have your Personal Data transferred to another Controller; the right to withdraw consent; and the right to lodge complaints with Data Protection Authorities. We may require proof of your identity before we can give effect to these rights.

Subject to applicable law, you may have a number of rights regarding the Processing of your Relevant Personal Data, including:

- the right not to provide your Personal Data to us (however, please note that we may be unable to provide you with the full benefit of our Sites, our CRM's, or our services, if you do not provide us with your Personal Data – e.g., we may not be able to process your orders without the necessary details);
- the right to request access to, or copies of, your Relevant Personal Data, together with information regarding the nature, Processing and disclosure of those Relevant Personal Data;
- the right to request rectification of any inaccuracies in your Relevant Personal Data;
- the right to request, on legitimate grounds:
  - erasure of your Relevant Personal Data; or
  - restriction of Processing of your Relevant Personal Data;
- the right to object, on legitimate grounds, to the Processing of your Relevant Personal Data by us or on our behalf;
- the right to have certain Relevant Personal Data transferred to another Controller, in a structured, commonly used and machine-readable format, to the extent applicable;
- where we Process your Relevant Personal Data on the basis of your consent, the right to withdraw that consent (noting that such withdrawal does not affect the lawfulness of any Processing performed prior to the date on which we receive notice of such withdrawal, and does not prevent the Processing of your Personal Data in reliance upon any other available legal bases); and
- the right to lodge complaints with a Data Protection Authority regarding the Processing of your Relevant Personal Data by us or on our behalf.
- we may require proof of your identity before we can give effect to these rights; and
- where your request requires the establishment of additional facts (e.g., a determination of whether any Processing is non-compliant with applicable law) we will investigate your request reasonably promptly, before deciding what action to take.
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- “CRM's” means any application we use to manage data
- “Adequate Jurisdiction” a jurisdiction that has been formally designated by the European Commission as providing an adequate level of protection for Personal Data.
- “Cookie” means a small file that is placed on your device when you visit a website (including our Sites). In this Policy, a reference to a “Cookie” includes analogous technologies such as web beacons and clear GIFs.
- “Controller” means the entity that decides how and why Personal Data are Processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.
- “Data Protection Authority” means an independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.
- “EEA” means the European Economic Area.
- “Personal Data” means information that is about any individual, or from which any individual is directly or indirectly identifiable, in particular by reference to an identifier such as a name, an identification number,



location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

- “Process”, “Processing” or “Processed” means anything that is done with any Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- “Processor” means any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).
- “Relevant Personal Data” means Personal Data in respect of which we are the Controller. It expressly does not include Personal Data of which we are not the Controller.
- “Sensitive Personal Data” means Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that may be deemed to be sensitive under applicable law.
- “Standard Contractual Clauses” means template transfer clauses adopted by the European Commission or adopted by a Data Protection Authority and approved by the European Commission.
- “Site” means any website operated, or maintained, by us or on our behalf.

**This does not affect your statutory rights.**

To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Policy, or about our Processing of your Personal Data, please use the contact details provided in the Contact details section at the bottom of this page.

## Cookies and similar technologies (Cookie Policy)

### Summary – Cookies and similar technologies

We may Process your Personal Data by placing or reading Cookies and similar technologies.

When you visit a Site or use an App we may place Cookies onto your device, or read Cookies already on your device, subject always to obtaining your consent, where required, in accordance with applicable law. We use Cookies to record information about your device, your browser and, in some cases, your preferences and browsing habits. We may Process your Personal Data through Cookies and similar technologies.

### Cookie Policy for Our Website

This is the Cookie Policy for Our Website, accessible from [www.pro-business.co.uk](http://www.pro-business.co.uk)

### What Are Cookies

As is common practice with almost all professional websites this site uses cookies, which are tiny files that are downloaded to your computer, to improve your experience. This page describes what information they gather, how we use it and why we sometimes need to store these cookies. We will also share how you can prevent these cookies from being stored however this may downgrade or 'break' certain elements of the sites functionality.

### How We Use Cookies

We use cookies for a variety of reasons detailed below. Unfortunately in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this site. It is recommended that you leave on all cookies if you are not sure whether you need them or not in case they are used to provide a service that you use.

### **Disabling Cookies**

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features on our site. Therefore it is recommended that you do not disable cookies.

### **The Cookies We Set**

This site uses Google Analytics which is one of the most widespread and trusted analytics solution on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content. For more information on Google Analytics cookies, see the official Google Analytics page.

We also use social media buttons and/or plugins on this site that allow you to connect with your social network in various ways. For these to work the following social media sites including; Instagram, Twitter, Facebook and LinkedIn, will set cookies through our site which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

## **Contact details**

The Company, or Company affiliate may be contacted at the relevant address set out below.

You may contact us about your direct marketing preference by emailing: [office@cswater.co.uk](mailto:office@cswater.co.uk)

If you wish to be taken off our contact list for direct marketing, or if you have any comments, questions or concerns about any of the information in this Policy, or any other issues relating to the Processing of Personal Data carried out by us, or on our behalf, please contact:

Pro Business Advisors Ltd  
185 Washway Road  
Sale  
M33 4AH  
[info@pro-business.co.uk](mailto:info@pro-business.co.uk)

## **Definitions**

**“Credentials”** means any login usernames and passwords for devices and apps.

**“Products”** means any physical product made or licensed by Pro Business Advisors Ltd.

**“Services”** means any services provided by Pro Business Advisors Ltd.

**“CRM”** means any application made available by us (including where we make such applications available via third party stores or marketplaces, or by any other means).

**“Adequate Jurisdiction”** a jurisdiction that has been formally designated by the European Commission as providing an adequate level of protection for Personal Data.

**“Cookie”** means a small file that is placed on your device when you visit a website (including our Sites). In this Policy, a reference to a “Cookie” includes analogous technologies such as web beacons and clear GIFs.

**“Controller”** means the entity that decides how and why Personal Data are Processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.

**“Data Protection Authority”** means an independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.

**“EEA”** means the European Economic Area.

**“Personal Data”** means information that is about any individual, or from which any individual is directly or indirectly identifiable, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

**“Process”, “Processing” or “Processed”** means anything that is done with any Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**“Processor”** means any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).

**“Relevant Personal Data”** means Personal Data in respect of which we are the Controller. It expressly does not include Personal Data of which we are not the Controller.

**“Sensitive Personal Data”** means Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that may be deemed to be sensitive under applicable law.

**“Standard Contractual Clauses”** means template transfer clauses adopted by the European Commission or adopted by a Data Protection Authority and approved by the European Commission.

**“Site”** means any website operated, or maintained, by us or on our behalf.