



PRIVACY POLICY

1. SCOPE

Trust is at the heart of our business and we take your privacy seriously.

This privacy notice (“Policy”) applies to the use of your Information by Kootek Consulting Ltd Limited with company number 15555878, registered in England and Wales with its registered address at 182-184 High Street North East Ham, London, E6 2JA. (“Kootek Consulting”, “we” “us” or “our”).

We use your Information by this Policy in our capacity as a Data Controller, in respect of each of our business activities including consulting, websites, applications and supplementary or related services (each a “Service”).

In this Policy: “Data Controller” means the entity which determines the purposes and means of processing Information; “Event” means a physical or digital service hosted by us or on our behalf; and “Information” means any information relating to an identified or identifiable person.

2. YOUR INFORMATION

2.1. How we collect it:

(a) We collect your Information when you:

- (i) Contact us;
 - (ii) Visit our websites or other applications;
 - (iii) Booking appointments
 - (iii) Attend an Event;
 - (iv) Download content from our website;
 - (v) Register for a newsletter;
 - (vi) Subscribe to a publication;
 - (vii) Subscribe to an "on-demand" service
- (b) We automatically collect your Information (for example as set out at Section 2.2(f) (“What we collect”)) when you use our websites and/or applications, including through the use of cookies. Please see our Cookies Policy for more details.

2.2. **What we collect:**

- (a) Contact details, such as your name, email address, postal address, social media handle and phone number;
- (b) Your job title and organisation;
- (c) Other account or Event registration and profile information, such as educational, employment and professional background;

Type of Use Legal Basis

1. Perform the Services requested by you;
 - (a) To perform a contract with you;
2. Manage your access to and use of the Services;
 - (a) To perform a contract with you;
 - (b) For our legitimate interest in monitoring your use of and improving the Services;
 - (c) To comply with our legal obligations;
3. Deliver customer care, technical support and security;
 - (a) To perform a contract with you;
 - (b) To comply with our legal obligations ;
4. Provide you with updates, operational announcements and other news in relation to the Services;
 - (a) To perform a contract with you;
 - (b) For our legitimate interest in developing our relationship with you and providing enhanced services to you;
5. Deliver targeted advertisements, promotional communications, notices and other information related to services provided by us.
6. Call monitoring for training and quality monitoring purposes, including the recording of sales and/ or marketing calls made to you.
 - (a) To perform a contract with you;
 - (b) For our legitimate interest in monitoring and improving our relationship with you;
7. Invite you to take part in user testing and surveys, competitions and promotions;
 - (a) For our legitimate interest in improving, customising and enhancing our Services;
 - (b) For our legitimate interest in developing our relationship with you and providing enhanced services to you;

8. Identify usage trends and develop data analysis, including for research, audit, reporting and other business purposes;
 - (a) For our legitimate interest in improving, customising and enhancing our Services;
9. Disclose data to selected third parties by this Policy;
 - (a) To perform a contract with you;
 - (b) For our legitimate interest in offering or delivering complementary services to you;
 - (c) To comply with our legal obligations.
 - (d) In certain circumstances, where you have provided consent;
10. Send you notices and requests about the Services, for example, to collect payment.
 - (a) To perform a contract with you;
 - (b) For our legitimate interest in resolving disputes and enforcing our agreements.
 - (e) Comments, feedback and other information you provide to us including when you engage with our customer support team;

2.3. **How we use it:**

Depending on which Service you use, your relationship with us and how you interact with us, we use your Information as set out in the table below, which also sets out the legal basis for using your Information. Where we use your Information for a legitimate interest, we balance this interest against your privacy rights to ensure it does not override or materially impact your privacy rights.

2.4. **Direct Marketing**

We will only contact you with direct marketing communications (“Direct Marketing”) where we are lawfully permitted to, or have a lawful basis to do so because you have engaged with us by requesting information or using our Services, unless you have opted out of receiving Direct Marketing. You may opt-out from receiving our Direct Marketing at any time by using the “unsubscribe” or “manage your preferences” link included within each communication, or in the case of telephone marketing by notifying us on the call.

In particular, you can choose to no longer receive marketing emails from us by contacting us or clicking unsubscribe from a marketing email. Please note that it may take us a few days to update our records to reflect your request. If you ask us to remove you from our marketing list, we shall keep a record of your name and email address to ensure that we do not send you marketing information in the future.

3. Third Parties

We may share your information for our legitimate interests with

- (a) Our group: our group companies to better develop, modify, enhance or improve our services and/or communications for the benefits of our customers.
- (b) Purchasers or sellers of a business or asset: in the context of a sale, merger or acquisition, to facilitate such a transaction and/or enable your interaction with the service despite any change in ownership.
- (c) Business partners: we work with businesses to provide goods and services that are complementary to our own. We only share information with them where (i) you have requested services from us that they provide or (ii) you explicitly consent.

3.3. Third Party Websites

If you choose to visit a third-party website about our services, please be aware that your Information will be used by the privacy policy of that third party as published on their website, over which we have no control.

4. Data Retention

We retain your Information for no longer than necessary in respect of the purpose(s) for which it was collected. Our data retention procedures consider the extent to which retention of your information is required to best provide you with and develop our products and services, manage your relationship with us, and meet our statutory, contractual, legal, accounting and audit obligations. If we have anonymised your Information, we may continue to use this information indefinitely.

How long we keep your data for

We only keep your data for as long as is necessary to fulfil the purpose we collected it. This includes keeping it for legal, accounting or reporting requirements.

- Enquiry data is deleted after dealing with the enquiry
- Contractual data is kept for 6 years after the end of the contractual relationship for tax and legal purposes
- Business development data is kept for two years after the development activity but may be kept for longer in an anonymised format to provide historical insight into business operations
- Direct marketing data is kept until you unsubscribe from our marketing lists
- If you have not unsubscribed from our marketing lists and are not engaged with any of our content, we reserve the right to remove you from our marketing lists after 7 years

- At this point, your data will be anonymized within our database, and you will only be contacted again should you re-subscribe to our marketing list and/or register for any of our in-person or online events
- Recruitment data is kept for one year for unsuccessful applicants
- In some circumstances you can ask us to delete your data: see below section 7. Your Rights.

5. **Transferring your Information outside the UK**

The information you provide to us may be transferred to countries outside the UK, including for example if our affiliates, services or servers or those of our service providers are from time to time located in a country outside of the UK. If we transfer your information outside of the UK, we will take appropriate security and other measures with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy and as required by law. These measures may include entering contracts that require the protection of your Information and/or specific contractual terms approved by the European Commission.

6. **Data Security**

Information security is OUR passion. We employ appropriate technical and organisational security measures to protect your Information, including from accidental loss, unauthorised use or disclosure.

These security measures include:

- (a) Limiting access to your Information to those who have a genuine business need to access it, who do so in an authorised manner and subject to a duty of confidentiality.
- (b) Maintain the integrity and availability of our technology systems.
- (c) Ensuring adequate data and disaster recovery processes; and
- (d) Monitoring the effectiveness of our security measures.

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.

7. Your Rights

Where we process your data, you can:

- Access and obtain a copy of your data on request
- Require us to change incorrect or incomplete data
- Require us to delete, or stop processing your data, for example where the data is no longer necessary for processing
- Request us to restrict the processing of your data
- Request the transfer of your data to another party and
- Object to the processing of your data where the company is relying on its legitimate interests as the legal ground for processing
- Withdraw your consent
- You can help us keep your personal data accurate and up to date by keeping us informed if your personal information changes.

If you would like to exercise any of these rights, please contact us at data@kootek.co.uk.

You will not have to pay a fee to access your data or to exercise any of the other rights under data protection laws. However, we may charge a reasonable fee if your access request is excessive, unfounded or you request additional copies. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to confirm your identity before we can ensure your right to access the information (or to exercise any of your other rights). This is to ensure that personal information is not disclosed to any person who has no right to receive it.

In addition to your ability to prevent Direct Marketing by section 2.4 (“Direct Marketing”), you can exercise your rights by writing to us at Kootek Consulting Ltd, 182-184 High Street North, East Ham, London E6 2JA., United Kingdom or sending an email to data@kootek.co.uk.

8. Sensitive Information

We do not otherwise knowingly or intentionally collect Sensitive Information and we request that you do not submit Sensitive Information to us. If you inadvertently or intentionally submit Sensitive Information to us, you will be considered to have explicitly consented to us processing it for its deletion.

In Section 8, “Sensitive Information” is information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information to uniquely identify an individual, information concerning health or information concerning a natural person’s sex life or sexual orientation.

9. **Minors**

We do not knowingly contact or collect Information from persons under the age of 16 (“minors”). If we become aware that a minor has provided us with Information, we will take steps to delete such information.

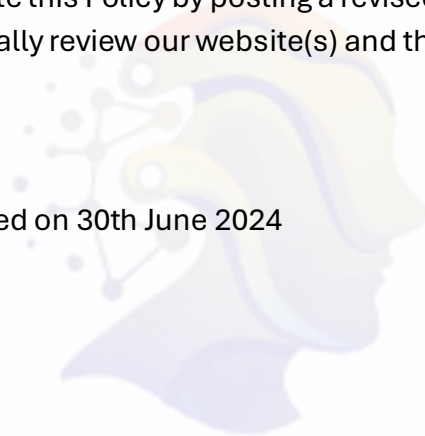
10. **Complaints and Questions**

If you wish to raise a complaint or question about how we use your Information, please contact us at data@kootek.co.uk and we will strive to assist you. If you are unsatisfied, you may also contact a data protection supervisory authority, for example, the UK Information Commissioner’s Office.

11. **Changes to this Policy**

We will occasionally update this Policy by posting a revised version on our website(s). We encourage you to periodically review our website(s) and this Policy to be informed of how we use your information.

This Policy was last updated on 30th June 2024



KOOTEK CONSULTING LTD

DATA ANALYTICS AND INFORMATION SECURITY SPECIALIST