

April Strategy LLP Privacy Notice

25th May 2018

Data Protection Principles

Personal data must be processed in accordance with six 'Data Protection Principles.' It must:

- be processed fairly, lawfully and transparently;
- be collected and processed only for specified, explicit and legitimate purposes;
- be adequate, relevant and limited to what is necessary for the purposes for which it is processed;
- be accurate and kept up to date. Any inaccurate data must be deleted or rectified without delay;
- not be kept for longer than is necessary for the purposes for which it is processed; and
- be processed securely.

We are accountable for these principles and must be able to show that we are compliant.

What information do we collect?

We collect information about you when you visit our website; discuss potential project work; enter into a client or supplier agreement with us; agree to participate in research because of your knowledge of or connection with our clients' products and services; or apply for employment with us.

What information do we not collect about you?

We do not require or process special categories of information relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, biometric data or sexual orientation.

How will we use the information about you?

When you visit our website, a record of your visit is made. That data is used completely anonymously, in order to determine the number of people who visit our website and the most frequently used sections of the site. This enables us to continually update and refine the site. If you use the form on the website to send an email to us, a record will also be made of your email address.

We may collect, hold, use and disclose information collected as is necessary in the performance of our services to our clients; for complying with a legal obligation; responding to any email enquiries; as part of our legitimate interests in marketing our services to existing and potential clients; or to determine suitability for employment.

We will not use or disclose your personal information for any other purpose which is not related to the above purposes without your consent, unless otherwise authorised, required or permitted under the laws of England and Wales.

If you no longer wish to receive information about our services, please send an email to info@aprilstrategy.com advising that you do not wish to receive further information.

Will we disclose your data?

We may disclose your personal information (or that of your employees, workers, agents or other third parties where you supply it to us for the purposes of providing our services) on a confidential basis to our clients or associates for the fulfilment of a contract. This will only be done with your knowledge

and agreement. We may also be required to disclose information in connection with the financial or administrative operation of our business such as to our accountants or regulatory authorities.

We require those third parties to keep your personal data confidential and secure and to protect it in accordance with the law and our policies. They are only permitted to process your data for the lawful purpose for which it has been shared and in accordance with our instructions.

How long will we retain personal data?

Personal data will not be kept for longer than is necessary for the purposes for which it is processed.

Access to your information and other rights

Under the GDPR and the Data Protection Act 2018 (DPA 2018) you have a number of rights with regard to your personal data.

Please contact us at info@aprilstrategy.com should you require more detail/wish to exercise your rights.

- The right to information about what personal data we process, how and on what basis as set out in this Privacy Notice.
- The right to access your own personal data by way of a subject access request. Identification will be requested for security.
- The right to correct any inaccuracies in your personal data.
- The right to request that we erase your personal data, however this would only be where we were not entitled under the law to process it or it is no longer necessary to process it for the purpose it was collected.
- The right to object to data processing where we are relying on a legitimate interest to do so and you think that your rights and interests outweigh our own and you wish us to stop.
- The right to object if we process your personal data for the purposes of direct marketing.
- The right to receive a copy of your personal data and to transfer your personal data to another data controller. We will not charge for this and will in most cases aim to do this within one month.
- With some exceptions, the right not to be subjected to automated decision-making.
- In most situations, the right to be notified of a significant data security breach concerning your personal data.
- In most situations we will not rely on your consent as a lawful ground to process your data. If we do however request your consent to the processing of your personal data for a specific purpose, you have the right not to consent or to withdraw your consent later.
- We want to make sure that your personal information is accurate and up to date. Please contact us to correct or remove information you think is inaccurate or out of date.

Complaints

You have the right to complain to the Information Commissioner. You can do this by contacting the Information Commissioner's Office directly. Full contact details including a helpline number can be found on the Information Commissioner's Office website (www.ico.org.uk). This website has further information on your rights and our obligations.

Identification will also be requested for security.

Cookies

This website uses Google Analytics, a web analytics service provided by Google, Inc. Google Analytics sets a cookie in order to evaluate your use of this website and compile reports for us on activity on the website. Google stores the information collected by the cookie on servers in the United States. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. For further information visit www.aboutcookies.org or www.allaboutcookies.org.

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

How to contact us

Please review the website regularly as this statement may change from time to time. If you have any questions about our privacy policy or information we hold about you please contact: info@aprilstrategy.com