**PupaePrivacy Ltd**

**Privacy Notice**

PupaePrivacy Ltd is a boutique consultancy specialising in Data Privacy and Data Protection Subject Matter Expertise. As such, PupaePrivacy Ltd takes privacy issues very seriously. PupaePrivacy Limited is fully committed to protecting your personal data and commercially sensitive data and shall always be clear and transparent with you and your business about how PupaePrivacy Ltd is using your personal data and company details.

Whatever personal data PupaePrivacy Ltd hold PupaePrivacy Ltd shall process your personal data in full accordance the General Data Protection Regulation ([GDPR](http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=EN)) and the UK [Data Protection Act 2018](http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted). PupaePrivacy Ltd will be clear and open about what information PupaePrivacy Ltd collect, why PupaePrivacy Ltd need it, and how PupaePrivacy Ltd intend to use it. This Privacy Notice explains how PupaePrivacy Ltd obtain, collect, process and store information about you and your business and if PupaePrivacy Ltd share with any third parties and details of your rights.

**Who are PupaePrivacy Ltd?**

PupaePrivacy Limited is a data privacy and data protection subject matter expert consultancy and is a registered company based in England under the Registration number 15671187. PupaePrivacy Ltd are registered with the UK Information Commissioners Office under the reference **ZB702218**

The full contact details for PupaePrivacy Ltd and the Data Protection Officer can be found at the end of this Privacy Notice.

This Privacy Notice covers all information held by the organisation captured by electronic means, via paper records, from individual persons or from social media platforms. This Privacy Notice covers our main website [www.pupaeprivacy.co.uk/](http://www.pupaeprivacy.co.uk/) and PupaePrivacy Training website and Huumain website which are wholly owned and operated by PupaePrivacy Ltd.

PupaePrivacy Ltd collect and use your personal data and personal information for the purposes of offering our Privacy and Data Protection services to you and to allow us to comply with our legal and fiduciary duties. To be as clear and transparent as possible PupaePrivacy Ltd have divided this Privacy Notice into the different types of data which PupaePrivacy Ltd hold so that you can identify the processing which affects you, quickly.

**How PupaePrivacy Ltd obtains your information**

In most of the contact you have with PupaePrivacy Ltd you will be able to volunteer and freely give us your personal details and information. Before PupaePrivacy Ltd capture and record your information PupaePrivacy Ltd will clearly and explicitly tell you why PupaePrivacy Ltd need the information and how PupaePrivacy Ltd will use it, for example if you make an enquiry with us or PupaePrivacy Ltd need to contact you at a later date or time or more than once.

PupaePrivacy Ltd may be given your details by a third party acting on your behalf, for example, your employer or personal assistant or PupaePrivacy Ltd may identify your details from professional social networks, directories or referral networks which you and PupaePrivacy Ltd both use, that PupaePrivacy Ltd is a member of, operates, or is from public domain records such as the internet.

**What Information PupaePrivacy Ltd captures and why**

**IF YOU ARE A CLIENT OR PROSPECT**

**How PupaePrivacy Ltd obtain your information**

PupaePrivacy Ltd will obtain information directly from you, either in person, via normal business channels such as email, telephone, Zoom, Teams and social media etc and, also in person, for example at networking events.

PupaePrivacy Ltd may identify your details from public domain sources and, also purchase legal and qualified third-party data (see section on Marketing below),

**What Information PupaePrivacy Ltd captures and why**

* Personal data is required to allow us to provide our consultancy, advice, support and training services to our clients.
* PupaePrivacy Ltd will capture your name, company and contact details and details of any colleagues with whom PupaePrivacy Ltd may need to communicate. If you or your company volunteer any other information, PupaePrivacy Ltd may also record this where necessary to deliver the service.
* PupaePrivacy Ltd may capture and record sensitive information, such as about disability you may have, if you feel PupaePrivacy Ltd need to know about this to deliver a service.

**Who PupaePrivacy Ltd will share this with**

PupaePrivacy Ltd will not share your personal information with any third parties save with your permission or required or allowed by law, for example, to obtain legal advice. If PupaePrivacy Ltd feel another company can assist you when PupaePrivacy Ltd cannot then your consent will be obtained before sharing your information with them.

**On what legal basis does PupaePrivacy Ltd process your information?**

If you have made contact with PupaePrivacy Ltd, it shall rely on legitimate interests to record your information, and if PupaePrivacy Ltd wish to send you administrative or marketing emails, PupaePrivacy Ltd rely on what is called the soft-opt-in to send those emails to you (at any time you can ask us to stop sending these to you).

If PupaePrivacy Ltd wish to record any sensitive information about you, for example, about your dietary requirements, then PupaePrivacy Ltd will have to have a legal reason to do so, or ask for your explicit consent,

If PupaePrivacy Ltd are in negotiation with you for goods or services then PupaePrivacy Ltd shall rely upon contractual obligations to process the information, as PupaePrivacy Ltd will either have a contract in place or be in negotiations to enter into one.

**IF YOU ARE A PARTNER**

**How PupaePrivacy Ltd obtains your information**

Directly from you or via a third party introducing us

**What Information PupaePrivacy Ltd captures and why**

PupaPrivacy Ltd will use the information you give us to open up a mutually beneficial channel of communication and when a more formal relationship is required, use the information to enter into a contractual relationship. Only business related personal and contact details of the partner, and perhaps their client if you are acting as a reference site and details of the project in hand will be collected

**Who PupaePrivacy Ltd will share this with**

Other business partners but only where you give us your consent.

PupaePrivacy Ltd will share data on a case-by-case basis and unless there are exceptional circumstances, where PupaePrivacy Ltd may rely upon legal obligations or our legitimate interest, will only share with your permission, PupaePrivacy Ltd do not systematically share data with third parties.

**On what legal basis does PupaePrivacy Ltd process your information?**

With the consent and on the authority of the with the consent of your company Owner Founder, CEO or authorised and mandated persons. Where that is not obtained, as appropriate PupaePrivacy Ltd rely on our legitimate business interest and contractual and or legal obligations to process personal data.

**TRAINING**

If you are to attend one of the PupaePrivacy Ltd virtual or physical training courses, PupaePrivacy Ltd needs to know your name, company address and contact details to deliver training and support your training and learning experience. PupaePrivacy Ltd may also need to ask for other specific sensitive information; for example about any medical conditions you have and may affect the method of training you require in order to attend and which PupaePrivacy Ltd may be able to offer particular assistance with in terms of virtual or physical training, learning materials or other additional help.

PupaePrivacy Ltd may ask for your ethnicity for diversity, equity and inclusion monitoring purposes and so that PupaePrivacy Ltd can provide statistical analysis to the relevant regulatory body, but this will be completely optional, voluntary and anonymous.

PupaePrivacy may ask if you have any dietary requirements to accommodate any catering requirements on the day and/ or your next of kin details in case of an emergency on the day.

**Who PupaePrivacy Ltd will share this with**

PupaePrivacy Ltd will share your information with the relevant Employer or Training venue or regulatory body, as appropriate. A separate Privacy Notice will be issued to attendees of PupaePrivacy Ltd Training at 3rd party Training Events and venues.

If you are a company or work for a company, or have purchased licenses through a third party and asked them to supply the licenses, then that third party may also have access to non-sensitive personal data, i.e. your contact details and information relating to the attendance and delivery of the Training Event and venue etc.

In order to maintain and develop PupaePrivacy Ltd Services and any platforms your personal details may be seen by PupaePrivacy Ltd web maintenance and support and web developers. They will only access this under PupaePrivacy Ltd explicit instructions and guidance.

**On what legal basis do PupaePrivacy Ltd process your information?**

As an individual learner you will give your information to us directly and PupaePrivacy Ltd will process this information with your explicit consent, and then in line with our contractual obligations to offer the service to you.

As a business user, either as an administrator, or as a delegate/learner, PupaePrivacy Ltd will process your details using your consent where you have given this, or our legitimate business interests where this does not impact on your fundamental rights or freedoms. PupaePrivacy Ltd may also process your data to fulfil our contractual obligations with your employer or strategic partner placing the order.

Processing personal data for legitimate interests means PupaePrivacy Ltd need to process your information for purposes such as monitoring our network for fraud and crime detection,

PupaePrivacy Ltd may also share data with third parties if PupaePrivacy Ltd are required to do so by law, for example to the police, or under a court order.

PupaePrivacy Ltd may share your information with a third party if it is in the defence of a legal claim for example, seeking legal advice from a solicitor.

**How PupaePrivacy Ltd obtain your information**

PupaePrivacy Ltd will ask you for the information directly or receive this from a recruitment agency with your consent.

**What Information PupaePrivacy Ltd capture and why**

**HUMAN RESOURCES, PAYROLL & FINANCE**

PupaePrivacy Ltd may capture employee data to comply with employment legislation and ensure that all staff and volunteers working within the organisation are qualified, competent, vetted and receive ongoing training.

**On what legal basis do PupaePrivacy Ltd process your information?**

PupaePrivacy Ltd may process your data under contractual obligations, employment legislation and, also where applicable, with your consent and our legitimate interests.

**VISITING THE PUPAEPRIVACY WEBSITE**

**How PupaePrivacy Ltd obtain your information**

PupaePrivacy Ltd may collect information from you when you interact with us, for example, when you use our websites, perhaps by making a general enquiry or signing up for Privacy Advice or Support services or a newsletter.

By visiting our website PupaePrivacy Ltd will be able to see your IP address and the pages you visit. The PupaePrivacy Ltd Website Provider is IONOS which uses cookies on the website <https://www.ionos.co.uk/cookies>

**What Information PupaePrivacy Ltd capture and why**

As a website visitor PupaePrivacy Ltd may capture your IP address, Mac, address, operating system type (PC, iPhone, Windows 10 etc), what pages you visited, location, dates and time. This is managed via Google Analytics via our website Platform Provider Ionos, which is detailed via the link above in the Ionos Cookie Policy. You will be asked to consent before semi-anonymous data is collected by Google.

If you, or your company register to use our service, PupaePrivacy Ltd shall capture your name, contact details, and if you are the Administrator or paying for the service, details of your purchase history. No credit or Debit card payments are managed by the company and these are managed and held by bank transfer or other available secure alternative payment methods.

**Google Analytics**

PupaePrivacy Ltd may use Google Analytics to analyse the use of the websites via the website platform provider Ionos; Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users’ devices.

The information generated relating to our website is used to create reports about the use of our website. Details captured during your visit will include, but not limited to, traffic data, location data, weblogs and other communication data and the resources you access, however, all data collected is anonymous and will may identify you as an individual.

Google via Ionos, not PupaePrivacy Ltd store this activity information, and you can view Google’s [privacy policy](http://www.google.com/privacypolicy.html) here.

To opt out of being tracked by Google Analytics across all websites visit their online [opt-out page](https://tools.google.com/dlpage/gaoptout)

**How PupaePrivacy Ltd will store your information and where and how PupaePrivacy Ltd will protect it**

If you sign up for our Advice service your data is hosted on a secure server within the UK. Where PupaePrivacy Ltd website platform and developers are however located outside of the UK, EU or EEA they have controlled access to this site and the information on it. The Website provider, analytics and platform for PupaePrivacy Ltd is approved as having sufficient protection to meet the requirements of the EU GDPR and UK GDPR adequacy and equivalence.

**How long will PupaePrivacy Ltd keep your information?**

PupaePrivacy Ltd will keep your information for no longer than is necessary. PupaePrivacy Ltd swill follow any statutory time limits and regulator best practice guidelines, but the following will give you an idea of how long PupaePrivacy Ltd shall retain your information.

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| **Data type** | **Reason** | **Retention period** |
| Client information | All client information – to prove consents and in case of legal disputes | 7 years after relationship ends or last activity |
| Enquiries | PupaePrivacy Ltd retain for this period as often enquiries can take this period of time to come to fruition. | 2 years |
| Financial Information | PupaePrivacy Ltd Invoices and Payments for Business Purposes and Tax records, etc – for legal purposes | 10 years |
| Analytics | Semi-anonymous analytical data | 7 years |
| Email broadcasting | Semi-anonymous analytical data from email interaction | 7 years |

Your rights are detailed below and you have a right to ask us to stop processing or remove certain types of personal data, especially sensitive data. Where there is no overriding lawful reason why PupaePrivacy Ltd need to do this PupaePrivacy Ltd shall always honour your request.

**BUSINESS CONTACTS, MARKETING & ADMINISTRATION**

If you are a learner or business contact PupaePrivacy Ltd will ask you if you would like to receive regular communications from us, and PupaePrivacy Ltd shall do this in accordance with any guidelines concerning the data protection or ePrivacy (electronic marketing) regulations. You can change your preferences at any time, and if you ask us to stop communicating with you, PupaePrivacy Ltd shall action this request immediately.

PupaePrivacy Ltd need to manage our business for example, processing invoices, entering into contracts and to do that PupaePrivacy Ltd rely on our legitimate interests, legal obligations and fulfilment of our contractual obligations.

PupaePrivacy Ltd may use your personal information to obtain legal advice or if it is necessary to defend a legal claim or pursue a bad debt, and PupaePrivacy Ltd may have to pass your information to public authorities and organisations where the law requires us to do so.

To ensure that emails and ICT networks have not been compromised and PupaePrivacy Ltd will monitor network traffic and may process personal data as a result of this monitoring.

**Email Marketing**

PupaePrivacy Ltd do stay in touch with clients and prospects using email and to do this PupaePrivacy Ltd use an email broadcast company. Emails will either be fully opted-in by the subscriber, or PupaePrivacy Ltd shall be relying on the [soft-opt-in rule](https://ico.org.uk/for-organisations/guide-to-pecr/?template=pdf&patch=31) within the ePrivacy legislation. Within our emails PupaePrivacy Ltd may utilise web beacon technology, sometimes called pixels, which allows us to see whether the email was delivered, which links were clicked and so on. This is to help us assess the success of campaigns and offer a better, more relevant service. The only information collected will be IP address, date/time, general location and device details. You can read more in our [cookie policy](https://www.griffinhouseconsultancy.co.uk/cookie-policy/).

PupaePrivacy Ltd never share this information or any of your details with third parties.

**How PupaePrivacy Ltd store your information**

All client information and files are retained on cloud servers hosted within the EU and Canada, and any files containing commercially sensitive or personally sensitive information are encrypted before saving to the server. PupaePrivacy Ltd store our marketing information in a robust CRM system, and ensure that only basic contact information, as stated above, is stored. Only authorised members of the team have access to your personal information, and PupaePrivacy Ltd back it up regularly to prevent against loss or damage.

**Who do PupaePrivacy Ltd share with?**

PupaePrivacy will never sell personal data or personal information, or share it with any third party, any government agency or other party entitled to this information by law, statute or court order.

However, if in the event that the PupaePrivacy Ltd is ever sold as a going concern, or enters into administration, the database of clients and prospects shall be deemed an asset of the company, and the preferences, consents and permissions provided by the individual or companies shall be transferred to the new owners.

PupaePrivacy Ltd may from time-to-time sub-contract elements of its operation to data processors, such as a mailing house, or market research company, but they will be working as a data processor on behalf of PupaePrivacy Ltd, who shall at all times remain responsible for the confidentiality of the data. Any data processor will be vetted and sufficient guarantees, duties and responsibilities in contracts will be put in place to protect the integrity and privacy of your data.

Where possible data will remain on servers within the UK, EU and EEA, or in a third country listed on the EU’s approved country list, or on servers within the United States if the company is registered as a part of the approved scheme for the EU and US Privacy Framework for Data Transfers.

**YOUR RIGHTS**

The Data Protection Act 2018 and GDPR affords Data Subjects (that is people whose information PupaePrivacy Ltd capture) certain rights and these are listed below for your convenience:-

* You have the **right to access** a copy of the personal information PupaePrivacy Ltd hold about you by making a Data Subject Access Request (DSAR), you can do this by phone, in writing or by email to PupaePrivacy Ltd for attention of the Georgine Anthony (Full contact details are provided at the end of this Privacy Policy)  
  PupaePrivacy Ltd will require you to verify you and your company identity before PupaePrivacy Ltd can proceed.
* You have the **right of rectification** to amend or update your personal information and ensure PupaePrivacy Ltd maintains accurate and up to date records and or data about you.
* You have the **right to erasure**, also known as ‘the right to be forgotten’.  
  The broad principle underpinning this right is to enable an individual to request the deletion or removal of personal data where there is no compelling reason for its continued processing by PupaePrivacy Ltd.
* You have the **right to ‘Restrict’ or suppress** the processing of your personal data.  
  Processing of your personal information may be restricted in the event it is no longer essential to support the use of services provided to you and is no longer needed for any contractual, legal or financial reasons. In those cases, Pupae Privacy is permitted to store the personal data, but not further process it.  
  PupaePrivacy Ltd may retain just enough information about you to ensure that any restriction is respected in the future.
* You have the **right to data portability** which allows individuals to obtain and or reuse their personal data for their own purposes across different services. It allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.
* You have the **right to object** to the processing of your personal information based on consent or our legitimate interests for direct marketing including profiling activity; and processing for purposes of scientific and or historical research and statistics.
* You have right to be made aware of any **automated decision-making**, that made without any human involvement, and/or profiling of your personal information by PupaePrivacy Ltd.  
  PupaePrivacy Ltd may use an automated process to receive payments or refunds. This will not retain or store any PCI DSS data
* You have an absolute right to ask us to stop sending you **direct mail or marketing emails**.

For some processing you will have given PupaePrivacy Ltd permission to process your information based on your preferences and consent, in these circumstances you can change your preferences or withdraw your consent at any time. however, PupaePrivacy Ltd may still need to keep the information for other legal reasons.

In certain situations, the above rights may not apply, for example if you entered into a Service Level Agreement or minimum term contract, PupaePrivacy Ltd may have to write to you or your company about your contract even if you asked us previously not to, but in this case PupaePrivacy Ltd would not send you any further direct marketing communication.

**FURTHER QUESTIONS?**

If you have any further questions, do not hesitate to contact us.

Georgine Anthony  
Director – PupaePrivacy Ltd

Our entry details on the ICO’s Register of Fee Payers  
Data Controller: PupaePrivacy Limited  
Trading Address:  
167A Grange Road  
Plaistow  
London  
E13 0HA UK

Tel: +44 (0)204 473 3699

Registration Number: **ZB702218**

**INFORMATION COMMISSIONER’S OFFICE**

Finally, if you are unhappy with the way PupaePrivacy Ltd have processed your information, you have the right to lodge a complaint with the Office of the Information Commissioner, contact details below.

**Information Commissioner’s Office**Wycliffe House  
Water Lane  
Wilmslow  
Cheshire, SK9 5AF

Helpline: 0303 123 1113 (local rate) or +44 1625 545 745

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