

# **Glenmorven Associates Ltd**

## **Privacy Policy, Terms and Conditions**

Welcome to our website. If you continue to browse and use this website, you are agreeing to comply with and be bound by the following terms and conditions of use, which together with our privacy policy govern 'Glenmorven Associates Ltd' relationship with you in relation to this website. If you disagree with any part of these terms and conditions, please do not use our website.

The term 'Glenmorven Associates Ltd' or 'us' or 'we' refers to the owner of the website whose registered office is 173 London Road, Cheltenham, Gloucestershire, GL52 6HN, United Kingdom. Our company registration number is 12374562. The term 'you' refers to the user or viewer of our website.

The use of this website is subject to the following terms of use:

- The content of the pages of this website is for your general information and use only. It is subject to change without notice.
- This website uses cookies to collect anonymous visitor statistics but no personal data is collected. If you do not wish your visit to our site to be tracked anonymously, you can use the "in private browsing" option in your browser.
- Neither we nor any third parties provide any warranty or guarantee as to the accuracy, timeliness, performance, completeness or suitability of the information and materials found or offered on this website for any particular purpose. You acknowledge that such information and materials may contain inaccuracies or errors and we expressly exclude liability for any such inaccuracies or errors to the fullest extent permitted by law.
- Your use of any information or materials on this website is entirely at your own risk, for which we shall not be liable. It shall be your own responsibility to ensure that any products, services or information available through this website meet your specific requirements.
- This website contains material which is owned by or licensed to us. This material includes, but is not limited to, the design, layout, look, appearance and graphics. Reproduction is prohibited other than in accordance with the copyright notice, which forms part of these terms and conditions.
- Unauthorised use of this website may give rise to a claim for damages and/or be a criminal offence.
- From time to time this website may also include links to other websites. These links are provided for your convenience to provide further information. They do not signify that we endorse the website(s). We have no responsibility for the content of the linked website(s).
- Your use of this website and any dispute arising out of such use of the website is subject to the laws of England, Northern Ireland, Scotland and Wales.

## **Privacy Policy**

Glenmorven Associates Ltd are responsible for your personal data and are aware of its obligations under the General Data Protection Regulation (GDPR). Your data will be controlled by Glenmorven Associates Ltd and the Company is therefore regarded as an independent data controller i.e. it determines the processes to be used when using your personal data. The contact details are: company address is to be confirmed or we can be emailed at [consulting@glenmorven.com](mailto:consulting@glenmorven.com)

This privacy notice sets out, in line with GDPR, the types of personal data that we collect and process about our guests and web-site visitors. It also sets out how we use that information, how long we keep it for and other relevant information about your data. We may revise this Policy at any time by amending this page. You are expected to check this page from time to time to take notice of any changes we make, as they are binding on you.

### **What personal data we collect about you**

For the purpose of this policy, personal data refers to information that relates to an identifiable, living individual, including information such as an online identifier for example an IP address. For clarity, it should be noted that personal data does not include anonymized data.

There are 6 lawful reasons for processing personal data, which are:

1. You give consent for us to process your data
2. It is necessary to fulfil a contractual obligation with you
3. There is a regulatory obligation on us to do so
4. It is in the legitimate interest of the company to do so
5. It is in the public interest to do so
6. It is in your vital interest to do so.

We may process certain types of personal data about you and the details as follows:

- Identity Data may include your first name, maiden name, last name, username, marital status, title, date of birth and gender.
- Contact Data may include your billing address, email address and telephone numbers.
- Financial Data may include your bank account and payment card details.
- Transaction Data may include details about payments between us and other details of purchases made by you.
- Technical Data may include, internet protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access our website.
- Profile Data may include contact preferences, feedback and survey responses.
- Usage Data may include information about how you use our website.
- Marketing and Communications Data may include your preferences in receiving marketing communications from us and our third parties and your communication preferences.

*We do not collect sensitive data.*

We may also process Aggregated Data from your personal data, but this data does not reveal your identity and as such in itself is not personal data. An example of this is where we review

your Usage Data to work out the percentage of website users using a specific feature of our site. If we link the Aggregated Data with your personal data so that you can be identified from it, then it is treated as personal data but it would not be our intention to do so.

Where we are required to collect personal data by law, or under the terms of the contract between us and you, if you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver the Services to you) and therefore may have to cancel your contract.

### **How we collect your data**

We collect personal data about you through a variety of different methods including:

- **Direct Interactions:** You may provide data when filling in forms on the website (or otherwise) by communicating with us by post, phone, email.
- **Automated technologies or interactions:** As you use our site, we may automatically collect Technical Data about your equipment, browsing actions and usage patterns. We collect this data by using cookies, server logs and similar technologies. We may also receive technical data about you if you visit other websites that use our cookies.
- **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources as set out below:
  - Analytics providers such as Google based outside the EU;
  - Identity and Contact Data from publicly available sources such as LinkedIn.

### **How we use the information we collect**

In terms of background information, the legal grounds for using your personal information are:

- **Consent:** Glenmorven Associates Ltd may in some circumstances need your consent to use your personal information. You can withdraw your consent by contacting us.
- **Obligations of a contract:** Glenmorven Associates Ltd may need to collect and use your personal information to enter into a contract with you or to perform our obligations under a contract with you.
- **Legitimate interest:** Glenmorven Associates Ltd may use your personal information for what we identify as our legitimate interests.
- **Compliance with the law:** we may use your personal information as necessary to comply with applicable laws and regulations.

We may do the following with your personal information that we have gathered:

1. Use it to provide Glenmorven Associates Ltd services to a relevant client.
2. Use it to engage in marketing and business development activity in relation to our service e.g. sending you newsletters and other information that we believe may be of interest to you.
3. To comply with legal and regulatory obligations that we have a duty to discharge.
4. Use it to establish, exercise or defend our legal rights or for the purpose of legal proceedings.
5. To record and monitor your use of our websites, social media or our other services for Glenmorven Associates Ltd business purposes. This may include analysis of usage, measurement of website performance and generation of marketing reports.

6. Use it for our legitimate business interests, such as for undertaking business research and analysis, managing the operation of our business and improving our websites and interfaces.
7. Use it to look into any complaints, concerns or issues you may have.
8. Use it to prevent and respond to actual or potential fraud or illegal activities.

### **How we share information with third parties**

We share personal information internally with the various members of the Company where it is necessary for staff to undertake their duties in provision of the Services to you.

We may also share your personal information outside the Glenmorven Associates Ltd. This may include:

- Third party agents/suppliers or contractors, bound by obligations of confidentiality, in connection with the processing of your personal information for the purposes described in this Policy. This may include, but is not limited to, our IT and communications service providers.
- To the extent required by law, regulation or court order, for example, if we are under a duty to disclose your personal information in order to comply with any legal obligation.

### **How we protect your data**

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. Glenmorven Associates Ltd ensures that the personal information that we hold is subject to the appropriate security measures.

Where we share your data with third parties, we provide written instructions to them to ensure that your data are held securely and in line with GDPR requirements. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

### **Retaining your information and how we secure it**

How long Glenmorven Associates Ltd keeps your personal information will vary and will depend primarily on:

- The purpose for which we are using your personal information – we will need to keep the information for as long as is necessary for the relevant purpose
- Legal obligations – laws or regulation may set a minimum period for which we have to keep your personal information

Glenmorven Associates Ltd will retain your personal data for as long as necessary to fulfil the purposes that we collected it for. The appropriate retention period is determined by the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process and whether we can achieve those purposes through other means, and the applicable legal requirements.

Upon expiry of the applicable retention period we securely destroy your personal data in accordance with applicable laws and regulations.

## Your choices and rights

You have a number of rights in relation to the personal information that Glenmorven Associates Ltd hold about you and you can exercise your rights by contacting us directly. These rights include:

- **The right to be informed:** This means that we must tell you how we use your data, and this is the purpose of this privacy notice
- **Obtaining or accessing your data:** Regarding the processing of your personal information and access to the personal information which we hold about you. To do so, you should make a subject access request
- **Correcting your data:** Requesting that we correct your personal information if it is inaccurate or incomplete. If any data that we hold about you is incomplete or inaccurate, you can require us to correct it
- **Deletion of your data:** Requesting that we erase your personal information in certain circumstances. If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it
- **Objecting/Restricting us processing:** Requesting that we restrict, our processing of your personal information in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal information but we are legally entitled to refuse that request.
- **Portability/Moving your data:** You may transfer the data that we hold on you for your own purposes
- **Objection to the inclusion of any information:** You have the right to object to the way we use your data where we are using it for our legitimate interests
- **To regulate any automated decision-making and profiling of personal data:** You have a right not to be subject to automated decision making in way that adversely affects you.
- **Lodge a complaint about processing:** We strive to meet the highest standards when collecting and using personal information. Complaints are taken very seriously, and data subjects are encouraged to bring any issues to our attention. Please contact us at [consulting@glenmorven.com](mailto:consulting@glenmorven.com) Alternatively you may complain to the relevant data protection supervising authority (e.g. The Information Commissioners Office (ICO) in the UK), if you think that any of your rights have been infringed by us.

## Glenmorven Associates Ltd Cookies Policy

Glenmorven Associates Ltd also use Google Analytics to help analyse use of Sites. Google Analytics generate statistical and other information about website use by means of cookies, which are stored by users' web browsers on their computer. The information generated relating to our website is used to create reports about the use of the website. Google hold this information and provide us access to it. Google's privacy policy is at <http://www.google.com/privacypolicy.html>

### How long will cookies remain on my computer?

Cookies remain in the cookies file of your browser after the closing of the browser, and will become active again when the Site is reopened, until removed. The cookie(s) can be deleted at any time by you. The cookie(s) will not collect any information when you are not accessing the Site.