



OUR PRIVACY POLICY

This document explains how we use your personal data

Minimal Risk Consultancy Limited (“**Minimal Risk**” or “**We**”), a limited liability company with registered number 04939593 and having its registered office at Skylon Court, Rotherwas, Hereford HR2 6JS. This website is run and administered by HM Studio, Sole Prop, Hugh Miller trading as HM Studio and having its registered office at 2nd Floor, The Terrace Business Centre, 1 Eaton Terrace Road New Redruth, Alberton, 1449, South Africa

, and we are the data controller for all personal data collected through this website.

We are committed to ensuring the privacy of our clients, contractors and suppliers and other website visitors. In this policy we explain how we hold, process and retain your personal data.

1. How we use your personal data

1.1. This section provides you with information about:

- 1.1.1. what personal data we hold and process;
- 1.1.2. in respect of personal data that we did not collect from you directly, where we obtained that data from, and what types of data we have collected;
- 1.1.3. the purposes for which we may process your personal data; and
- 1.1.4. the legal grounds on which we process your data.

1.2. Contact data

We may process contact details that you provide to us (“**contact data**”). This contact data may include your name, telephone number, and email address, or those of any of your personnel and may be provided through our website when you express an interest in using any of our services, or purchasing one of our products. We may use this contact data to send you a welcome email. The legal basis for this processing is our legitimate interest in introducing you to our website.

We may process your contact data if you decide to use any of our services, or purchase one of the products available from our website. Your contact data may be processed in this way for the purposes of performing any contract we may have or subsequently enter into with you, or in taking steps at your request prior to entering into a contract.

We may use this contact data to contact you to discuss your use of our website, and how our website performed and functioned for you. This may include requesting you to complete surveys about our website and service. The legal basis for this processing is our legitimate interest in ensuring the efficient administration and continued function of our website by users.

Where you have provided your consent for us to do so, we may send you marketing communications, including communications regarding our latest products and services, we may pass your details to selected third parties for them to contact you regarding their latest promotions and offer, and we may send you newsletters.

Where we pass your information to third parties, unless it is to our parent company or a group company as described in clause 2.1.1 below, this information will be anonymized and aggregated with other user information (for example, we may inform them that 500 men aged 50 or over have clicked on their advertisement on any given day). These third parties may use such aggregated data to target particular demographics (for example, men aged 50 or over resident in Herefordshire).

Unless you have requested us not to do so, if you are an existing customer, we may send you marketing communications by email and SMS about goods and services similar to those which you have previously purchased from us or enquired about.

1.3. Payment data

If you decide to purchase one of the products or services available from our website, we will ask you for further information in order to complete a purchase ('**purchase data**'). This purchase data may include your address, financial and credit card information, a personal description of yourself, a photograph, details of your personal identifications such as your passport, driver's license or identity card, utility bills, bank statements, and tax statements.

We may use this data to process your purchase. This may include contacting you with a summary of your order, requesting and processing payment, and administering necessary identification checks.

The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

1.4. Website data

We may process data about your use of our website and services ("**website data**"). The website data may include your IP address, geographical location, browser type and version, time zone setting, browser plug-in types, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the website data is our analytics tracking system. This website data may be processed for the purposes of analysing the use of the website and services.

The legal basis for processing is our legitimate interests, namely monitoring and improving our website and services.

1.5. Enquiry data

We may process information contained in any other enquiry you submit to us regarding our products or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant products and/or services to you, by us or our parent company or a group company as described in clause 2.1.1. below.

The legal basis for this processing is consent.

1.6. Notification data

We may process information that you provide to us for the purpose of subscribing to our newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you newsletters.

The legal basis for this processing is consent.

1.7. Correspondence data

We may process information contained in or relating to any other communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content

and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping.

The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business communications with users.

1.8. Other processing activities

In addition to the specific purposes for which we may process your personal data set out above, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

Please do not supply any other person's personal data to us, unless we prompt you to do so or have entered into a written data processing agreement with you.

2. Providing your personal data to others

2.1. Our partner service providers.

We may disclose your data to:

2.1.1. our parent company, Arcfyre Group of Block C Unit 17 Blueberry Office Park, Apple St, Honeydew, Johannesburg 2170, South Africa (our '**parent company**') and other group companies for the purposes of work finding and/or administering any contracts you may be offered from time to time.

2.1.2.our payroll service providers who are currently Thompson & Co of SME House, Unit 1 Holme Lacey Industrial Estate, Hereford HR2 6DR

2.1.3.our recruitment software providers who are currently ITS Software Systems Limited (trading as Eploy) a limited liability company with registered number 4583888 and having its registered office at Edwin Avenue, Hoo Farm Industrial Estate, Kidderminster, Worcestershire DY11 7RA

2.1.4.our marketing consultancy service providers who currently are Hm Studio and having its registered office at 2nd Floor, The Terrace Business Centre, 1 Eaton Terrace Road New Redruth, Alberton, South Africa

2.1.5.banks, and other organisations that we work with in order to provide services to you. This may include other companies within our group of companies.

2.1.6.Our Human Resources retained solicitors are HCR Law, a company whose office is located at Thorpe House, 29 Broad Street, Hereford, HR4 9AR

2.1 Our professional advisers

We may disclose your personal data to our professional advisers insofar as reasonably necessary for the purposes of managing risks, obtaining professional advice and managing legal disputes

2.2 Selected third parties for marketing

Where you have provided your consent for us to do so and we pass your information to third parties, this information will be anonymized and aggregated with other user information (for example, we may inform them that 500 men aged 50 or over have clicked on their advertisement on any given

day). These third parties may use such aggregated data to target particular demographics (for example, men aged 50 or over resident in Herefordshire).

We, or our parent/any group company may pass your personal data on to businesses we identify as potential employers for you that are identified to you by name or description and which but we shall not pass that information to any business to whom you have instructed us not to pass it.

2.3 Where we provide your personal data to any third party

Where we share your personal data with any third party, that is not our parent company or a group company, we will ensure that this processing is protected by appropriate safeguards including a suitable data processing agreement with that third party.

2.4 To comply with legal obligations

In addition to the specific disclosures of personal data detailed above, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation we have to comply with, or in order to protect your vital interests or the vital interests of another individual.

3 Transfers of your personal data outside of European Economic Area

Your personal data may be transferred and stored outside of the EEA, including, in South Africa where our parent company is based. It will also be processed by staff of our suppliers operating outside of the EEA.

Where your personal data is transferred outside of the EEA, we will ensure that either (a) the European Commission has made an "adequacy decision" with respect to the data protection laws of the country to which it is transferred, or (b) we have entered into a suitable data processing agreement with the third party situated in that country to ensure the adequate protection of your data. In all cases, transfers outside of the EEA will be protected by appropriate safeguards.

4 Retaining and deleting personal data

4.1 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

4.2 Unless we contact you and obtain your consent for us to retain your personal data for a longer period, we will retain and delete your personal data as follows:

4.2.1 Contact data will be retained for 5 years following the date of our last contact or dealing with you, at the end of which period it will be deleted from our systems.

4.2.2 Purchase data will be retained for 7 years following the date on which that purchase is completed, at the end of which period it will be deleted from our systems.

4.2.3 Website data will be retained for 2 years following the date of our last contact or dealing with you, at the end of which period it will be deleted from our systems.

4.2.4 Enquiry data will be retained for 2 years following the date of our last contact or dealing with you, at the end of which period it will be deleted from our systems.

4.2.5 Notification data will be retained for 2 years following the date of our last contact or dealing with you, at the end of which period it will be deleted from our systems.

4.2.6 Correspondence data will be retained for 5 years following the date of our last contact or dealing with you, at the end of which period it will be deleted from our systems.

4.2.7 Data relating to any employment placement we introduce to you will be retained for 5 years following the date upon which you started employment or other engagement by virtue of such placement.

4.3 We may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

5 Amendments

We may update this policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you are happy with any changes to this policy.

We may notify you of significant changes to this policy only, by email.

6 Your rights

6.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:

6.1.1 your request not being found to be unfounded or excessive, in which case a charge may apply; and

6.1.2 the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

6.2 We may withhold personal information that you request to the extent permitted by law.

6.3 You may instruct us at any time not to process your personal information for marketing purposes.

6.4 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

6.5 The rights you have under data protection law are:

6.5.1 the right to access;

6.5.2 the right to rectification;

6.5.3 the right to erasure;

6.5.4 the right to restrict processing;

6.5.5 the right to object to processing;

6.5.6 the right to data portability;

6.5.7 the right to complain to a supervisory authority; and

6.5.8 the right to withdraw consent.

6.6 **Your right to access your data.** You have the right to ask us to confirm whether or not we process your personal data and, to have access to the personal data, and any additional information. That additional information includes the purposes for which we process your data, the categories of personal data we hold and the recipients of that personal data. You may request a copy of your personal data. The first copy will be provided free of charge, but we may charge a reasonable fee for additional copies.

6.7 **Your right to rectification.** If we hold any inaccurate personal data about you, you have the right to have these inaccuracies rectified. Where necessary for the purposes of the processing, you also have the right to have any incomplete personal data about you completed.

6.8 **Your right to erasure.** In certain circumstances you have the right to have personal data that we hold about you erased. This will be done without undue delay. These circumstances include the following: it is no longer necessary for us to hold those personal data in relation to the purposes for which they were originally collected or otherwise processed; you withdraw your consent to any processing which requires consent; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are certain general exclusions of the right to erasure, including where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for establishing, exercising or defending legal claims.

6.9 **Your right to restrict processing.** In certain circumstances you have the right for the processing of your personal data to be restricted. This is the case where: you do not think that the personal data we hold about you is accurate; your data is being processed unlawfully, but you do not want your data to be erased; it is no longer necessary for us to hold your personal data for the purposes of our processing, and are waiting for that objection to be verified. Where processing has been restricted for one of these reasons, we may continue to store your personal data. However, we will only process it for other reasons: with your consent; in relation to a legal claim; for the protection of the rights of another natural or legal person; or for the reasons of important public interest.

6.10 **Your right to object to processing.** You can object to us processing your personal data on grounds relating to your particular situation, but only as far as our legal basis for the processing is that it is necessary for: the performance of a task carried out in the public interest, or in the exercise of any official authority vested in us; or the purposes of our legitimate interests or those of a third party. If you make an objection, we will stop processing your personal information unless we are able to: demonstrate compelling legitimate grounds for the processing, and that these legitimate grounds override your interests, rights and freedoms; or the processing is in relation to a legal claim.

6.11 **Your right to object to direct marketing.** You can object to us processing your personal data for direct marketing purposes. If you make an objection, we will stop processing your personal data for this purpose.

6.12 **Your right to object for statistical purposes.** You can object to us processing your personal data for statistical purposes on grounds relating to your particular situation, unless the processing is necessary for performing a task carried out for reasons of public interest.

6.13 **Automated data processing.** To the extent that the legal basis we are relying on for processing your personal data is consent, and where the processing is automated, you are entitled to receive your personal data from us in a structured, commonly used and machine-

readable format. However, you may not have this right if it would adversely affect the rights and freedoms of others.

6.14 **Complaining to a supervisory authority.** If you think that our processing of your personal data infringes data protection laws, you can lodge a complaint with a supervisory authority responsible for data protection. You may do this in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

6.15 **Right to withdraw consent.** To the extent that the legal basis we are relying on for processing your personal data is consent, you are entitled to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

6.16 **Exercising your rights.** You may exercise any of your rights in relation to your personal data by written notice to us in addition to the other methods specified above.

7 Cookie Policy

For information on how we use Cookies please see our Cookie Policy at

alrisk.co.uk/cookiepolicy.aspx

<http://www.minimalriskrecruitment.com/cookiepolicy.aspx>

Our details

7.1 This website is owned and operated by us and our parent company.

7.2 We are registered in England and Wales under registered number 04939593 and our registered office is at Skylon Court, Rotherwas, Hereford, HR2 6JS.

7.3 You can contact us:

7.3.1 by post, using the postal address given above;

7.3.2 using our website contact form;

7.3.3 by telephone, on the contact number on our website from time to time; or

7.3.4 by email, using the email address published on our website from time to time.

8 Data Protection officer

Our data protection officer's contact details are: David McKeown, who can be contacted via [email: david@minimalrisk.co.uk](mailto:david@minimalrisk.co.uk), or telephone: 01432 359353.