


Privacy Notice for DPP Clients

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Approved By:	Jo Robison
Position:	Director
Date:	30/06/22
Signature:	 A handwritten signature in black ink that reads 'Jo Robison'. The signature is written in a cursive style and is positioned to the left of a vertical line.

PRIVACY NOTICE FOR DPP CLIENTS

What is the purpose of this document?

DPP is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you; before, during and after our contractual/working agreement with you, in accordance with the General Data Protection Regulation (GDPR).

In the context of GDPR DPP is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to potential, current or former DPP clients. We may update this notice at any time but if we do so, we will provide you with an updated copy of this notice as soon as reasonably practical.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

Data Protection Principles

DPP will comply with the data protection law. The law says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
3. Relevant to the purposes we have told you about and limited only to those purposes
4. Accurate and kept up to date
5. Kept only as long as necessary for the purposes we have told you about
6. Kept securely

What Information will we hold about you?

Please note that in this context personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We will collect, store and use the following categories of personal information about you:

1. Full name and title
2. Location of employment
3. Email address
4. Work contact numbers
5. Job title
6. Communication preferences

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We do not collect any Special Categories of Personal Data about you.

How is your information collected?

We collect information in the following ways:

1. Contact lists from projects where you are our client, or a mutually appointed party including but not limited to consultants, contractors, and other advisors
2. Where we have historically worked together as client, or mutually appointed party including the above
3. LinkedIn where you have mutually agreed to connect with at least one of our employees
4. Networking events that we have mutually attended and exchanged contact details
5. Information that is publicly available from a legitimate source

How will we use information about you?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. To manage our existing and prospective client relationships
2. To communicate with you regarding projects
3. To perform accounting, auditing, billing, and collection activities
4. Safeguard and defend DPP interests
5. Comply with applicable legal requirements, industry standards, and our policies
6. To request feedback through our customer feedback forms

Situations in which we will use your personal information

We need all the categories of information in the list above (see [paragraph](#)) primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. DPP does not sell, rent or trade personal data.

DPP may share the personal data only with:

1. Entities within DPP to whom it is reasonably necessary or desirable for DPP to disclose the personal data
2. Service providers that DPP has retained to perform services on its behalf, such as IT service providers, CRM service providers, debt control management; these service providers are not permitted to use the personal data for their own purposes
3. Law enforcement or other government authorities, if required by law or reasonably necessary

We collect your personal data in the performance of our services to ensure that project related information is communicated in the preferred manner.

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We send limited and relevant communications to you until such time as you withdraw your consent. Such information will be non-intrusive and will be solely processed on the grounds of legitimate interests based upon our working and organisational relationship. We provide an easy and clear manner for you to withdraw your consent at any time, and on every piece of communication.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Data Sharing

We may have to share your data with third parties, including third-party service providers and other entities in the company.

We require third parties to respect the security of your data and to treat it in accordance with the law.

Questions you may ask regarding the use of your personal information.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers and other entities within our company. The following third-party service providers process personal information about you for the following purposes:

1. IT Support
2. Finance and Credit Control Management
3. Client relationship management software

How secure is my information with third-party service providers and other entities in our group?

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All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. In this situation we will, so far as possible, share anonymised data with the other parties before the transaction completes. Once the transaction is completed, we will share your personal data with the other parties if and to the extent required under the terms of the transaction.

Transferring information outside the EU

DPP do not transfer data outside of the EU.

Data Security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from Jo Robison at info@dppukltd.com.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for. Details of retention periods for different aspects of your personal information are available on request. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a client of the company we will retain in line with our retention policy or securely destroy your personal information in accordance with applicable laws and regulations.

Rights of Access, Correction, Erasure and Restriction

Your duty to inform us of changes

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It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

1. Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
2. Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
3. Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
4. Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
5. Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
6. Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Jo Robison in writing: info@dppukltd.com.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

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You can withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide services to you. We will advise you if this is the case at the time you withdraw your consent. To withdraw your consent, please email unsubscribe@dppukltd.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data protection officer

If you have any questions about this privacy notice or how we handle your personal information, please contact Jo Robison. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.