

# Privacy Policy

## Introduction

Performance Reward Consulting are committed to safeguarding the privacy of our clients' data including that of our website users and our business prospects. We do not collect data unnecessarily.

This policy provides information about your rights in relation to the processing of personal data we may collect from you, or which you may provide to us while using our website or services.

## Why we collect data

We collect information in order for us to communicate with clients and prospects, to report on market trends, to provide our consulting services and to improve on our service offering. This includes data that may be provided to us through contact forms, direct dealings and approaches or consulting work we are undertaking.

## What type of information do we collect?

The type of information collected will include names, email addresses, telephone numbers etc to allow us to interact with clients and prospects.

We will collect data given voluntarily through forms on our website if a website user decides to do this.

We will also collect information on VAT numbers, supplier bank details and contact information to enable us to pay for services and comply with Revenue requests.

In addition, during consulting work, we may collect information about employee rewards as part of the consulting service we provide.

We will collect data from other sources such as public databases, publicly available information and social media platforms (including from connections in a business or friendship capacity).

In some cases, we will combine data from a number of sources as part of the legitimate work or marketing activity.

When you visit our website, a record is made of your visit and means of connection, for example the browser name, the pages you viewed, the date and time of your visit, the internet service provider and similar information. We use Google Analytics to assess this general information in order to improve our website and the services contained in it. Should you voluntarily decide to use a contact form on the website, a record will be held with your e mail address and contact details.

By using our website, you are agreeing to our use of information detailed in this policy. If you do not agree to this, we ask you not to use our website and not to provide us with personal data in respect of our services.

## **Sensitive personal information**

We do not collect any special categories of personal data. We ask that you do not share or disclose any sensitive personal information on or through the website. Sensitive personal data will include, for example, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health, criminal background or sexual orientation.

## **Use of data**

We will only use any collected information in line with prevailing data protection legislation. Data is collected or used when needed to in order to provide the services we offer to you through a contract and/or where it is needed for our legitimate business interests (and where your interests or rights do not overrule these). We also use data where we need to, in order to comply with relevant legislation.

Through the course of our work we may use your personal data for the following:

### *Marketing Activity*

We use your details to communicate with you on products or services which may be of interest. By providing your data to us, using our services and participating in our surveys, you agree to this contact. You can opt out of this at any time when you receive communication or marketing material from us by emailing the sender a message to unsubscribe. Alternatively, you can request an opt out at any time by mailing [patrick@performancerewardconsulting.com](mailto:patrick@performancerewardconsulting.com). We will not sell your data to any third parties and will only use it to market our own services.

### *Business Activity*

The type of business activity that we process personal data for may include:

- Personalisation of content, business information or user experience
- Account set up and contract administration
- Delivering marketing and events communication
- Analysis of web site usage and content
- Carrying out surveys and market research
- Provision of reward consulting service and analysis
- New product or service development
- Internal research and development purposes
- Legal obligations and regulation (e.g. prevention of fraud)
- Meeting audit requirements

We will also use your data to respond to any requests you make through our website or other approaches made by you, as part of our consulting service.

Note that in some cases the consulting services will be subject to additional terms, including additional privacy terms, as part of specific contractual arrangements.

## **If you fail to provide personal information**

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

## Basis for processing the data

Through the use of our website and consulting services we collect and process data as outlined above. Information on the legal basis in which we undertake this work is provided below:

<b>Our Services</b>	<b>Legitimate reason for processing and storing data</b>
<i>Provision of business activity / requested consulting services:</i>	<ul style="list-style-type: none"><li>• <b>Consent</b> – when work is requested or continuing</li><li>• <b>Legitimate business interests</b> - In the provision of requested services or ongoing business activity</li><li>• <b>Fulfilling contracts</b></li><li>• <b>Legal obligation</b> – To meet Revenue, legal or regulatory requirements</li></ul>
<i>Marketing activity including assessing the success of campaigns:</i>	<ul style="list-style-type: none"><li>• <b>Consent</b> – responding to specific requests</li><li>• <b>Legitimate business interests</b> – To provide information that is likely to be of interest to clients following requests, previous work or a likely business need. To keep clients and prospects informed about the business and services. To grow and develop the services to the benefit of clients and the company.</li></ul>
<i>Relationship management and information provision:</i>	<ul style="list-style-type: none"><li>• <b>Consent</b> – where details are provided during the course of consulting work and following work</li><li>• <b>Legitimate business interests</b> - In the provision of services and information including trend data, market information etc that is likely to be of interest to clients and prospects. To keep our records accurate and updated.</li><li>• <b>Fulfilling contracts</b></li></ul>
<i>Surveys and research:</i>	<ul style="list-style-type: none"><li>• <b>Consent</b> – where clients have indicated an interest in this</li><li>• <b>Legitimate business interests</b> – where the data may be of interest of benefit to clients, prospects and/or research participants.</li></ul>
<i>Administration including payment of suppliers:</i>	<ul style="list-style-type: none"><li>• <b>Consent</b> – where information has been provided for this purpose</li></ul>

	<ul style="list-style-type: none"> <li>• <b>Legitimate business interests</b> – where data is needed to provide the activity or service including payment processing</li> <li>• <b>Fulfilling contacts</b></li> <li>• <b>Legal obligation</b> – Revenue or other legal or regulatory requirements</li> </ul>
<p><i>To administer and improve our website, including improving data security and data analysis:</i></p>	<ul style="list-style-type: none"> <li>• <b>Legitimate business interests</b> – to keep the site functioning correctly and secure including resolution of issues. To provide services in a way that would be of interest or benefit to users keeping it up to date and the content relevant. To develop our service offering to meet the needs of end users</li> <li>• <b>Legal obligation</b> – To meet security and regulatory requirements</li> </ul>

The above gives an indication of the type of business activity and legal basis for processing data. Some of the above grounds for processing data will overlap and there may be several reasons, not necessarily just those outlined above, which justify our use of your personal information.

## Use of Cookies

Our website uses cookies. A cookie is a small file stored in your computer. We use only a minimal number of cookies to ensure that our website functions and gives you the best experience and enables us to improve the site content. This also allows us to ensure that content is being effectively used and is relevant. The use of all cookies is subject to this Policy and applicable legislation.

You can control the use of cookies at any time by changing your browser settings. Within the settings you can refuse to accept cookies by activating a browser setting which rejects them. It is important to note that this may affect the functions within our website. Enabling cookies is necessary if you wish your selections to be remembered for future visits on the same computer. If you do not change your browser setting to reject them, our website will use cookies as part of its functionality.

More information on cookies can be found on the website [www.aboutcookies.org](http://www.aboutcookies.org). This also gives details on how you can control or delete them.

## Google Analytics

We use Google Analytics, from time to time, to measure and track our website use. We use the data from this service to analyse the page visits, time and date of browsing etc. The information collected from this to help us improve our web site content and to make it more relevant for our service users. More information on Google Analytics and their privacy policy can be found on their web site <https://policies.google.com/technologies/partner-sites?>

Information on opting out of google analytics and an add on that can be used to do this can be found on <https://tools.google.com/dlpage/gaoptout>

## **Data sharing**

We may need to share your personal information with third parties where required by law, where it is necessary as part of our working relationship with you, to fulfil contracts with you, or where we have another legitimate interest in doing so. This could include:

- 1) Employees within Performance Reward Consulting as part of our legitimate business activity.
- 2) Third party suppliers in respect of the services we are carrying out, for example contractors and designated agents who provide a service to us as part of our legitimate business activity.
- 3) Analytics, search engine providers or web hosting service providers to provide or improve our service offering.
- 4) Third party suppliers in respect of events that you may register for to facilitate the event, for example confirmation of participants for accommodation, or confirmation of participants to event speakers or those administering the event.
- 5) In the event that our business is sold or acquired, client and prospect details including personal data shared, may be transferred to the acquiring company as part of the sale.
- 6) Where required to do so in order to comply with a court order or in legal or regulatory compliance.

By using our web site or contracting with us, you agree that we can share data in the above situations unless otherwise provided for under contract.

We do not sell your data to any third parties.

## **International data transfer**

We may transfer the personal information we collect about you to countries outside the EU in order to perform our contract or service with you. This, for example, could be where servers of a partner organisation are maintained outside the EU.

There are special requirements under GDPR relating to international transfers (under which we will comply). This is to regulate such transfers and make sure adequate security measures are in place to safeguard your data.

## **Data retention**

We retain data no longer than necessary to provide the services we offer and to comply with any legal or reporting requirements, including accounting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data. We will also consider the potential risk of harm from unauthorised use or disclosure of personal data, the purposes for which we process personal data and whether we can achieve those purposes through other means. We will also consider any applicable legal requirements.

We dispose of data in a responsible way.

## **Data security**

We take data security seriously given the nature of our work. We have put in place actions to safeguard data and to keep it secure, including technical and physical steps. We do not have control over the data that is transmitted to us by e mail or other electronic means. We therefore recommend that you do not transfer any sensitive data in this way. Where sensitive or confidential data is to be transferred, we request that appropriate encryption is put in place before transferring.

Our website uses an SSL certificate to ensure client data is protected, however we still request that any sensitive data is not transferred over the web site.

We have procedures to deal with any suspected data breach. In the event of a suspected breach you and any appropriate regulator will be notified as required by legislation.

## **Accessing your data / your rights**

You have a right to request your personal data in line with GDPR and other legislation. If you would like a copy of information we hold, this can be requested by e mailing our Managing Director & Data Compliance Manager (see below). In complying with legislation and protecting your data, we will need to verify your identity before releasing any data.

Under certain circumstances you may also have the right to:

- Request a correction of personal information
- Request removal of personal information
- Object to processing of personal information
- Request the restriction of processing of your personal information
- Request the transfer of your personal information to another party

You will not have to pay a fee to access your personal information. However, we may need to charge a reasonable fee for administrative costs if your request for access is considered manifestly unfounded or excessive. In exceptional situations where is request is considered to be manifestly unfounded or excessive, we may decline to provide information.

## **Data compliance**

The person responsible for data compliance is our Managing Director. He can be contacted at [patrick@performancerewardconsulting.com](mailto:patrick@performancerewardconsulting.com) . Questions relating to the web site or information requests should be directed to the Managing Director.

## **Other websites and links**

We may include links to other websites on our website, for example to provide reference information for the benefit of users. We have no control over the activity of any linked websites or of the content contained in them. We cannot vouch for the accuracy or otherwise of any a data contained in any linked websites. We also recommend you look at the privacy policy of any linked site before entering them.

## **Changes or updates to our privacy policy**

From time to time we may need to change or update this privacy policy in line with, for example, changing legislation or business needs. The date of this policy is set out below. When the policy is updated or changed it will be uploaded to our website. The effective date of the prevailing policy can be found on the bottom of the policy provided in the website. The latest date will supersede all previous policies. Using the website following a change or update will mean you accept the policy as defined on the website.

**Policy Date: 1 September 2018**