

# Privacy Policy (GDPR)

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## 1. Scope

This policy refers to the EU General Data Protection Regulations (GDPR) and applies to **Spearhead International Ltd** (Registered in England and Wales Company Number 01056769) and **Greens of Soham Ltd** (Registered in England and Wales Company Number 03915025) and any subsidiaries.

The privacy policy explains how we use any personal information we collect about you when you use this website and our wider services.

## 2. Main Terms

### 2.1 What is personal data?

Personal data relates to any information about a natural person that makes you identifiable which may include (but is not limited to):

- Names and contact information ie emails and telephone numbers
- National Insurance Numbers
- Employment history
- Employee numbers
- Credit History
- Personal tax
- Payroll and accounting data

### 2.2 What is sensitive personal data?

Sensitive personal data refers to the above but includes genetic data and biometric data. For example:

- Medical conditions
- Religious or philosophical beliefs and political opinions
- Racial or ethnic origin
- Convictions
- Biometric data (eg photo in an electronic passport)

### 2.3 What is a Data Controller?

For general data protection regulation purposes, the “data controller” means the person or organisation who decides the purposes for which and the way in which any personal data is processed.

The data controller is Spearhead International Ltd registered 136 High Street, Newmarket, CB8 8JP, UK.

### 2.4 What is a Data Processor?

A “data processor” is a person or organisation which processes personal data for the controller.

### 2.5 What is Data Processing?

Data processing is any operation or set of operations performed upon personal data, or sets of it, be it by automated systems or not. Examples of data processing explicitly listed in the text of the GDPR are: collection, recording, organising, structuring, storing, adapting, altering, retrieving, consulting, using, disclosing by transmission, disseminating or making available, aligning or combining, restricting, erasure or destruction.

### 2.6 What do we mean by Business to Business?

PLC, LTD, LLP incorporated partnerships, trusts and foundations, local authorities and government institutions.

### 2.7 What do we mean by Business to Consumer?

Private clients, sole traders, unincorporated partnerships, trusts and foundations.

### 3. What information do we collect about you and how?

Spearhead International Ltd as a Data Controller, is bound by the requirements of the General Data Protection Regulations (GDPR).

You agree that we are entitled to obtain, use and process the information you provide to us to enable us to discharge the Services (as defined in our Letter of Engagement and supporting Schedules) and for other related purposes including:

- Updating and enhancing client records
- Analysis for management purposes
- Carrying out credit checks in relation to you
- Statutory returns
- Legal and regulatory compliance
- Crime prevention.

We collect information about you when you fill in any of the forms on our website ie sending an enquiry, signing up for an event, filling in a survey, giving feedback etc. Website usage information is collected using cookies.

Cookies are text files put on your computer to collect standard internet log information and visitor behaviour information. This information is then used to track visitor use of the website and to create statistical reports on website activity. For more information visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. Please note in a few cases some of our website features may not function because of this.

#### 3.1 Analytics – eg how visitors use our website

We may use an Analytics tool such as Google Analytics to store information about how visitors use our website so that we may make improvements and give visitors a better user experience.

#### 3.2 IP addresses

An IP or Internet Protocol Address is a unique numerical address assigned to a computer as it logs on to the internet. Spearhead International Ltd do not have access to any personal identifiable information and we would never seek this information. Your IP address may be logged when visiting our site, but any analytic software would only use this information to track how many visitors we have from particular regions.

### 4. How will we use the information about you and why?

At Spearhead International Ltd we take your privacy seriously and will only use your personal information to provide the Services you have requested from us, detailed in your Letter of Engagement and supporting Schedules and as we have identified above. We will only use this information subject to your instructions, data protection law and our duty of confidentiality.

For Business to Business Clients and Contacts our lawful reason for processing your personal information will be “legitimate interests”. Under “legitimate interests” we can process your personal information if: we have a genuine and legitimate reason and we are not harming any of your rights and interests.

For Business to Consumer Clients and Contacts our lawful reason for processing your personal information will be “A contract with the individual” eg to supply goods and services you have requested, or to fulfil obligations under an employment contract. This also includes steps taken at your request before entering into a contract.

We may receive personal data from you for the purposes of our money laundering checks, such as a copy of your passport. This data will only be processed for the purposes of preventing money laundering and terrorist financing, or as otherwise permitted by law or with your express consent.

Our work for you may require us to pass your information to our third-party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing the Services to you on our behalf. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the Services and we have contracts in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

We collect information on our website to process your enquiry, deal with your event registration, give advice based on survey data and improve our services. If you agree, we will also use this information to share updates with you about our services which we believe may be of interest to you.

We will not share your information for marketing purposes with companies so that they may offer you their products and services.

## 5. Transferring your information outside of Europe

As part of the services offered to you through this website, the information which you give to us may be transferred to countries outside the European Union ("EU"). For example, some of our third-party providers may be located outside of the EU. Where this is the case we will take steps to make sure the right security measures are taken so that your privacy rights continue to be protected as outlined in this policy. By submitting your personal data, you're agreeing to this transfer, storing or processing. Where our third-party supplies are in the US we have ensured that their services fall under the "Privacy Shield" whereby participating companies are deemed to have adequate protection and therefore facilitate the transfer of information from the EU to the US.

If you use our services while you are outside the EU, your information may be transferred outside the EU to give you those services.

## 6. Security precautions in place about data collected

When you give us personal information, we take steps to make sure that it's treated securely. Any sensitive information (such as bank details) is stored safely.

Non-sensitive details (your email address etc.) are sent normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

## 7. Profiling

We may in the future, analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of extra information about you when it is available from external sources to help us do this effectively. We may also use your personal information to detect and cut fraud and credit risk.

## 8. Marketing

We may like to send you information about our services which may be of interest to you. If you have consented to receive marketing, you may opt out at any point as set out below.

You have a right at any time to stop us from contacting you for marketing purposes. To opt out please email: [hr@spearheadgroup.co.uk](mailto:hr@spearheadgroup.co.uk)

## 9. How long will we hold your data for?

Marketing: We will hold your data for a period of 6 years with a review every 3 years. You will have the opportunity to opt out or update or delete data at any point should you need to do so and details are set out in this policy as to how to do that.

Contracted Services: We will hold your data for 7 years in line with our regulatory requirements.

## 10. Access to your information, correction, portability and deletion

### 10.1 What is a Subject Access Request?

This is your right to request a copy of the information that we hold about you. If you would like a copy of some or all your personal information, please email [sar@spearheadgroup.co.uk](mailto:sar@spearheadgroup.co.uk). We will respond to your request within one month of receipt of the request.

We want to make sure your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate by emailing [hr@spearheadgroup.co.uk](mailto:hr@spearheadgroup.co.uk).

### 10.2 Objections to processing of personal data

It is your right to lodge an objection to the processing of your personal data if you feel the “ground relating to your particular situation” apply. The only reasons we will be able to deny your request is if we can show compelling legitimate grounds for the processing, which override your interest, rights and freedoms, or the processing is for the establishment, exercise or defence of a legal claims.

### 10.3 Data Portability

It is also your right to receive the personal data which you have given to us, in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller without delay from the current controller if:

- (a) The processing is based on consent or on a contract, and
- (b) The processing is carried out by automated means.

### 10.4 Your Right to be Forgotten

Should you wish for us to completely delete all information that we hold about you, email [hr@spearheadgroup.co.uk](mailto:hr@spearheadgroup.co.uk)

Or write to:

Spearhead International Ltd 3 Pioneer Court, Chivers Way, Histon, Cambridge CB24 9PT UK; or

Greens of Soham Ltd, Lords Ground Farm, Swaffham Prior, Cambridge CB25 0LQ UK

## 11. Other websites

If our website contains links to other websites, this privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

## 12. Complaints

If you feel that your personal data has been processed in a way that does not meet the GDPR, you have a specific right to lodge a complaint with the relevant supervisory authority. The supervisory authority will then tell you

of the progress and outcome of your complaint. The supervisory authority in the UK is the Information Commissioner's Office.

### **13. Changes to our Privacy Policy**

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated on 14<sup>th</sup> May 2018 and the Version number is 1.1 in line with the new GDPR guidelines.

### **14. How to contact us**

Please contact us if you have any questions about our privacy policy or information we hold about you using the detail supplied on this website.