

C2 Sapiant (C2 Sapiant," we", "us", or "our") respects individuals' privacy, we are committed to protecting and respecting the personal information provided to us by individuals or third parties. This Policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

This Policy sets out the basis on which any personal data we collect from an individual, or that is provided to us by an individual or any other third party, will be processed by us.

If you have any queries regarding this policy please contact us (at the contact details set out below) and we will do our best to deal with your query or complaint as soon as possible. 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 who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

C2 Sapiant is the controller and responsible for your personal data.

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

#### **PERSONAL INFORMATION WE MAY COLLECT**

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 may collect, use, store and transfer different kinds of personal data about individuals which we have grouped together as follows:

- Identity Data includes names, usernames or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of services individuals have purchased from us.
- Technical Data includes internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices used to access our website.
- Profile Data includes usernames and password, interests, preferences, feedback and survey responses.
- Usage Data includes information about usage of our website, products and services.
- Marketing and Communications Data includes preferences in receiving marketing and communications from us and our third parties and communication preferences.

#### **If an individual fails to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with an individual and they fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with the individual (for example, to provide an individual with products or services). In this case, we may have to cancel a product or service an individual has with us but we will notify the individual if this is the case at the time.

#### **HOW DO WE USE PERSONAL DATA**

We will only use an individual's personal data when the law allows us to. Most commonly, we will use an individual's personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with the individual.
- Where it is necessary for our legitimate interests (or those of a third party) and the individual's interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. Individuals have the right to withdraw consent to marketing at any time by contacting us at the details set out below.

#### **HOW DO WE COLLECT PERSONAL DATA & WHAT PURPOSE DO WE USE IT FOR**

The ways in which we collect, use, store and transfer personal data will vary depending on the individual with whom we are engaging. This will include differences in how we collect the personal data whether that is through direct interactions, third party or publicly available sources or through automated technologies or interactions.

We have set out below descriptions of the categories of individuals about whom we process personal data, and the ways we plan to process the personal data.

##### Clients

We process Identity, Contact, Financial, Transactional, Technical, Profile, Usage, Marketing and Communications Data about clients, including personal data of the employees, customers, and any other personal data disclosed to us by the client or their representatives, or obtained by us or anyone engaged by us, in relation to the services to be provided.

If you are a Client of C2 Sapient your personal data is processed by us, in relation to the matter on which you have instructed us.

##### Employees, Contractors & Prospective Employees

We have implemented a number of policies and privacy notices on our internal systems which set out how and why we will process staff data. We have updated all current staff on our revised approaches to data protection. All new members of staff will be provided with a relevant privacy notice as part of the induction process.

We have also implemented a new privacy notice for job applicants which is provided to individuals when they make an application for a position with C2 Sapient.

##### Suppliers & Service Providers

We process the Identity, Contact, Financial, and Transaction data of specific individuals at our suppliers and services providers to enable us to receive the services that they are providing.

We may also share this personal data with clients where the supplier or service provider needs to liaise directly with a client. For example, where an Associate of C2 Sapient is providing services to you.

We also need to process this personal data in order to manage the relationship between C2 Sapient and the relevant supplier or service provider.

##### Contacts

This category of individuals is quite broad and will include clients, suppliers, other individuals at professional services firms such as accountants and lawyers, third party service providers, and general business contacts made by our staff including individuals that they meet at marketing and other events. We will also add the personal data provided to us when individuals contact us via our website or sign up to attend one of our events.

The categories of personal data that we will collect about our contacts will include Identity, Contact, Financial, Transactional, Technical, Profile, Usage, Marketing and Communications Data.

#### **AUTOMATED TECHNOLOGIES OR INTERACTIONS**

As individuals interact with our website, we may automatically collect Technical Data about their equipment, browsing actions and patterns. We collect this personal data by using

cookies, server logs and other similar technologies. Please see [our cookie policy](#) for further details.

### **THIRD PARTIES OR PUBLICLY AVAILABLE SOURCES**

We may receive personal data about you from various third parties and public sources as set out below

- Technical Data from the following parties:
  - analytics providers such as Google based outside the EU; and
  - search information providers such as Jordans based inside the EU.
- Contact, Financial and Transaction Data from providers of technical, and payment and delivery services.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

### **WHERE WE STORE AND PROCESS PERSONAL DATA**

The data that we collect from individuals may be transferred to, and stored at, a destination inside or outside the European Economic Area (EEA). It may also be processed by staff operating inside or outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your instructions, the processing of your payment details and the provision of support services.

Whenever we transfer personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

### **DATA SECURITY**

We have put in place appropriate security measures to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process personal data on our instructions and they are subject to a duty of confidentiality.

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

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect personal data, we cannot guarantee the security of any data transmitted to our website; any transmission is at the individual's own risk. Once we have received an individual's information, we will use procedures and security features to try to prevent unauthorised access.

### **DISCLOSURE OF INFORMATION**

We may have to share personal data with the parties set out below for the purposes set out in this Policy.

- Service providers acting as processors based inside and outside the EU who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators including the SRA, the Law Society and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Experts.
- Third parties with whom we organise events.

We require all third parties to respect the security of personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use personal data for their own purposes and only permit them to process personal data for specified purposes and in accordance with our instructions.

### **YOUR RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights include:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you,

or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

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 certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us

#### No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these 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 your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

#### **DATA RETENTION**

We will only retain personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

#### **CHANGES TO OUR PRIVACY POLICY**

We may update this Policy at any time without notice. Any changes we may make to this Policy in the future will be posted on this page.

#### **CONTACT**

Questions, comments and requests regarding this Policy are welcomed and should be addressed to Steve Edwards [steve.edwards@c2sapient.com](mailto:steve.edwards@c2sapient.com)