

Pollitt & Partners

Privacy Policy and Cookie Policy

July 2022



Pollitt & Partners takes your privacy seriously. This privacy policy describes what personal information we collect and how we use it.

Our primary goal in collecting personal information from you is to provide you with a smooth, efficient, and personalised experience while using our services. This allows us to provide services and features that most likely meet your needs, and to customise our service to make your experience easier and quicker. Personal information will be used in accordance with the United Kingdom law and regulation on data protection, principally, the Data Protection Act 2018 (in this policy called “**Data Protection Requirements**”). This privacy notice aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide to us, through this website or otherwise.

This website is not intended for children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

1. **Data Controller**

Pollitt & Partners Limited (trading as Pollitt & Partners) company number 01565398 (“**Pollitt & Partners**”). Our registered office is at 91 Wimpole Street, London W1G 0EF. Pollitt & Partners is the controller and responsible for your personal data.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below:

Email address: andy.p@pollittandpartners.com;

Postal address: 91 Wimpole Street, London W1G 0EF;

Telephone number: +44 (0)20 7379 6709.

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 (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

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.



2. Your consent

Your use of this website signifies your consent to us collecting and using personal data about you as specified below in accordance with this policy statement. Should we choose to change these terms for any reason, the changes will be posted here so that you are always kept informed about the collection and use of your personal information, and when we disclose it.

3. Data security

- 3.1. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
- 3.2. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.
- 3.3. We will store all the personal information you provide on our secure password- and firewall-protected servers.
- 3.4. You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

4. The data we collect about you

- 4.1. Personal data means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:
 - 4.1.1. Identity Data includes name, position, postal address, telephone number, email address, and gender;
 - 4.1.2. Contact Data includes billing address, delivery address, email address and telephone number;
 - 4.1.3. Financial Data includes client bank account and payment details;
 - 4.1.4. Technical Data includes internet protocol (IP) address, your 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 you use to access this website;



- 4.1.5. Profile Data includes orders made by you, location, how you heard about us;
- 4.1.6. Usage Data includes information about how you use our website, products and services;
- 4.1.7. Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

5. How do we collect personal information about you and how is it used?

5.1. We use different methods to collect data from and about you including through:

5.1.1. Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

5.1.1.1. engage us to provide our services;

5.1.1.2. request that information about us is sent to you;

5.1.1.3. enter a competition, promotion or survey; or

5.1.1.4. give us some feedback.

5.1.2. Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies[MV2] .

5.1.3. Third parties or publicly available sources. We may receive personal data about you:

5.1.3.1. Technical Data from the following parties based inside or outside the European Economic Area (EEA):

5.1.3.1.1. analytics providers such as Google;

5.1.3.1.2. advertising networks; and

5.1.3.1.3. search information providers;



5.1.3.2. Contact, Financial and Transaction Data from providers of technical, payment and delivery services;

5.1.3.3. Identity and Contact Data from data brokers or aggregators;

5.1.3.4. Identity and Contact Data from publicly available sources.

6. How we use your personal data

6.1. We will only use your personal data when the Data Protection Requirements allows us to. Most commonly, we will use your personal data in the following circumstances:

6.1.1. where we need to perform the contract we are about to enter into or have entered into with you;

6.1.2. where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;

6.1.3. where we need to comply with a legal or regulatory obligation.

6.2. Generally we do not rely on consent as a legal basis for processing your personal data.

7. Purposes for which we will use your personal data

7.1. We may use your personal data to:

7.1.1. enable your use of the services available on the website;

7.1.2. process client orders, including sending goods and supplying services, and the management of payments;

7.1.3. manage our relationship with you which will include:

7.1.3.1. notifying you about changes to our terms or privacy policy;

7.1.3.2. improving your browsing experience by personalising the website;

7.1.3.3. sending to you general (non-marketing) commercial communications;



- 7.1.3.4. sending to you email notifications, sales enquiries, proposals and quotations which you have specifically requested;
- 7.1.3.5. dealing with enquiries and complaints made by or about you relating to the website;
- 7.1.3.6. keeping the website secure and to prevent fraud;
- 7.1.3.7. verifying compliance with the terms and conditions governing the use of the website;
- 7.1.3.8. inviting you to training, networking and exhibition events we feel may be of interest to you;
- 7.1.3.9. asking you to leave a review;
- 7.1.4. enable you to partake in a competition or complete a survey;
- 7.1.5. administer and protect our business and this website;
- 7.1.6. deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you;
- 7.1.7. use data analytics to improve our website, products/services, marketing, customer relationships and experiences;
- 7.1.8. make suggestions and recommendations to you about goods or services that may be of interest to you.
- 7.2. We may provide aggregate statistics about sales, customers, traffic patterns and information to third parties, but these statistics will not include any information that identifies you
- 7.3. You can adjust your privacy settings at any time by emailing andy.p@pollittandpartners.com advising your preferences in detail.
- 7.4. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.
- 7.5. Marketing
We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.



7.6. Promotional offers from us

- 7.6.1. We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).
- 7.6.2. You will receive marketing communications from us if you have requested information from us and have not opted out of receiving that marketing.

7.7. Third-party marketing

Where the website contains links to other websites. We are not responsible for the privacy policies or practices of third-party websites.

7.8. Opting out

- 7.8.1. You can ask us to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.
- 7.8.2. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service agreement/contract or other transactions.

7.9. Change of purpose

- 7.9.1. We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.
- 7.9.2. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- 7.9.3. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by the Data Protection Requirements.



8. Disclosure of your personal data

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

8.2. We may have to share your personal data with:

8.2.1. service providers who provide IT and system administration services;

8.2.2. professional advisers;

8.2.3. regulators and other authorities in the United Kingdom who require reporting of processing activities in certain circumstances.

8.3. The personal data disclosed to third parties may:

8.3.1. relate to performance of our contract with you;

8.3.2. be necessary for our legitimate interests or to comply with a legal obligation;

8.3.3. be third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

9. International transfers

9.1. Some of our external third parties may be based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

9.2. Whenever we transfer your 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:

9.2.1. 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. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries {https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu_en};

- 9.2.2. 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. For further details, see European Commission: Model contracts for the transfer of personal data to third countries {https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en}; and
 - 9.2.3. 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. For further details, see European Commission: EU-US Privacy Shield {https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en}.
- 9.3. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

10. What are cookies and how do we deal with them?

- 10.1. We use a number of different cookies on our site. If you do not know what cookies are, or how to control or delete them, then we recommend you visit <http://www.aboutcookies.org> for detailed guidance. The following describes the cookies we use on this site and what we use them for.
- 10.2. We use both “session” cookies and “persistent” cookies on the website. Session cookies will be deleted from your computer when you close your browser. Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date.
- 10.3. We will use the session cookies to: keep track of you whilst you navigate the website; prevent fraud and increase website security; and enhance your user experience. We will use the persistent cookies to: enable our website to recognise you when you visit; keep track of your preferences in relation to your use of our website; and remember your login details.
- 10.4. We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users’ computers. You can find out more about Google’s position on privacy as regards its analytics service at <http://www.google.co.uk/intl/en/analytics/privacyoverview.html>. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google’s privacy policy is available at: <http://www.google.com/privacypolicy.html>.



- 10.5. Social Buttons: on many of the pages of the site you will see ‘social buttons’. These enable users to share or bookmark the web pages. There are buttons for: Twitter, Vimeo, Instagram, Facebook, and LinkedIn. In order to implement these buttons and connect them to the relevant social networks and external sites, there are scripts from domains outside of this site. You should be aware that these sites are likely to be collecting information about what you are doing all around the internet, including on this site. So if you click on any of these buttons, these sites will be registering that action and may use that information. In some cases these sites will be registering the fact that you are visiting the specific pages you are on, even if you don’t click on the button if you are logged into their services, like Google and Facebook. You should check the respective policies of each of these sites to see how exactly they use your information and to find out how to opt out, or delete, such information.
- 10.6. We do not currently feature advertisers or payment services. However, if we should add these in the future, our advertisers and/or payment services providers may also send you cookies.
- 10.7. You can change your browser settings to disable cookies if you have privacy concerns. Disabling cookies for all sites is not recommended as it may interfere with your use of some sites. The best option is to disable or enable cookies on a per-site basis. Consult your browser documentation for instructions on how to block cookies and other tracking mechanisms.

11. Data retention

- 11.1. We will only retain your 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.
- 11.2. 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.
- 11.3. In some circumstances you can ask us to delete your data: see Request erasure of your personal data below for further information.
- 11.4. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.



12. Your legal rights

- 12.1. Under certain circumstances, you have rights under Data Protection Requirements in relation to your personal data. Further details are available about these rights from www.ico.org.uk
- 12.2. 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.
- 12.3. 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.
- 12.4. 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.

13. Data Protection Requirements

You have the right to:

- 13.1. Request access to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- 13.2. 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.
- 13.3. 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.



- 13.4. 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.
- 13.5. 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 cases:
 - 13.5.1. if you want us to establish the data's accuracy;
 - 13.5.2. where our use of the data is unlawful but you do not want us to erase it;
 - 13.5.3. 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
 - 13.5.4. you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 13.6. 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.
- 13.7. 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.