

BUSINESS MINDSCAPES LTD WEBSITE DATA PRIVACY POLICY

1 IMPORTANT NOTICE

- 1.1 Business Mindscapes Limited (07376375) of Forest View Drove Lane, Cold Ash, Thatcham, Berks, RG18 9NL (“we”, “us” or “our”) complies with the Data Protection Act 2018 (the “DPA”).
- 1.2 For the purposes of the DPA, where relevant we are the data controller.
- 1.3 Please read the following policy to understand how we may use the personal data you provide or which we collect about you.
- 1.4 We have appointed a manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details below.

Full name of legal entity:	Business Mindscapes Limited
Name or title of data privacy manager:	Sian Price
Postal address:	Forest View, Drove Lane, Cold Ash, Berkshire, RG18 9NL

- 1.5 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.
- 1.6 This policy may vary from time to time so please check it regularly.

2 THE PERSONAL DATA WE COLLECT

- 2.1 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).
- 2.2 We may collect, use, store and transfer the following personal data about you:
- 2.2.1 personal data you provide if you contact us using via our website;
 - 2.2.2 personal data you provide if you contact us (including by telephone) to register, subscribe or request services or products or details about them;
 - 2.2.3 personal data you provide if you purchase services or products via our website;
 - 2.2.4 personal data gathered using cookies;
 - 2.2.5 details of your visits to our website including but not limited to traffic data, location data, weblogs and other communication data; and/or
 - 2.2.6 information about your computer including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users’ browsing actions and patterns and does not identify any individual.
- 2.3 We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. 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).

3 HOW WE COLLECT YOUR PERSONAL DATA

- 3.1 We use different methods to collect data from and about you including through:
- 3.1.1 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:
- (a) apply for our products or services;
 - (b) subscribe to our service or newsletter or other publications;
 - (c) request marketing to be sent to you;
 - (d) enter a competition, promotion or survey;
 - (e) request to be invited to our events or
 - (f) give us feedback
- 3.1.2 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, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details
- 3.1.3 Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:
- (a) Technical Data from the following parties:
 - (i) analytics providers [such as Google based outside the EU];
 - (ii) advertising networks [such as AdRoll based inside OR outside the EU]; and
 - (iii) search information providers [such as Google based inside OR outside the EU].
- 3.1.4 Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- 3.1.5 Identity Data and Contact Data from data brokers or aggregators such as Corp Data based outside the EU.
- 3.1.6 Identity and Contact Data from publicly available sources such as Companies House, government websites and LinkedIn and which we may then aggregate together.
- 3.1.7 Identity, Contact, Financial, Transaction, Usage, Technical, Profile, Marketing and Communications Data from our staff who have been in contact with you for the delivery or potential delivery of services, invitation to our events or subscription of our newsletter.

4 HOW WE USE PERSONAL DATA COLLECTED

- 4.1 We will only use your personal data in compliance with the DPA.
- 4.2 We may use and process the personal data you provide for the purposes outlined below as well as for any purposes specified at the time of collection:
- 4.2.1 to send you information you have requested;
 - 4.2.2 to fulfil orders which you have placed for services or products;
 - 4.2.3 to deal with your enquiries;
 - 4.2.4 to develop, deliver and improve our products or services;
 - 4.2.5 to help us develop this website to be more useful to you;
 - 4.2.6 to contact you by telephone, SMS, post and/or email about other offers, products, promotions, developments or services our ours which we think may be of interest to

you. Please make it clear when you provide personal data to us, should you not wish to receive such information;

- 4.2.7 for website user processing research or analysis including to collect statistics, responses to any surveys and questionnaires, traffic patterns and related site information. (We aggregate this data and it does not identify any website users); and/or
- 4.2.8 for internal purposes for research, analysis, testing, monitoring, customer communication, risk management and administrative purposes.

5 DISCLOSURE OF YOUR PERSONAL DATA

- 5.1 We may disclose the personal data to our selected third-party business partners to fulfil an order for products or services or respond to an enquiry.
- 5.2 We may disclose the personal data to our group companies and affiliates or third-party data processors who may process data on our behalf to enable us to carry out our usual business practices.
- 5.3 We may share your information with other companies so that they may contact you by telephone, SMS, post and/or email about offers, products, promotions, developments or services which may be of interest to you. Please make it clear when you provide personal data to us, should you not wish to receive such information.
- 5.4 We may disclose your personal data to third parties in the following circumstances:
 - 5.4.1 to undertake the activities listed above;
 - 5.4.2 to conform to legal requirements or comply with legal process;
 - 5.4.3 to assist in the investigation of suspected illegal or wrongful activity. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;
 - 5.4.4 to protect and defend our rights or property;
 - 5.4.5 to deal with any misuse of the website; or
 - 5.4.6 to sell, make ready for sale or dispose of our business in whole or in part including to any potential buyer or their advisers.
 - 5.4.7 in order to enforce or apply our terms of use, terms and conditions of supply and other agreements with third parties.

6 YOUR RIGHTS

- 6.1 When you use this website and provide us with your personal data you are agreeing that we may use your personal data for the purposes set out in this policy.
- 6.2 You have the right to:
 - 6.2.1 request that we stop sending you marketing information;
 - 6.2.2 apply for a copy of the data we hold about you (for which we can charge an administration fee which is currently £10);
 - 6.2.3 request that we correct or remove any personal data which we hold about you which you believe is inaccurate or out of date;
 - 6.2.4 request access to your personal data;
 - 6.2.5 request erasure of your personal data;
 - 6.2.6 object to processing of your personal data;
 - 6.2.7 request restriction of processing your personal data;
 - 6.2.8 request transfer of your personal data; and

6.2.9 withdraw consent

6.3 You can exercise this right by contacting us at sian@businessmindscapes.com or at our postal address, Forest View Drove Lane, Cold Ash, Thatcham, Berks, RG18 9NL.

7 TRANSFERING PERSONAL DATA OVERSEAS

7.1 The personal data we collect from you is currently held within the European Economic Area (“EEA”). It is possible that in the future such personal data may be transferred, stored and/or processed outside the European Economic Area (“EEA”). By submitting your personal data, you agree to this transfer, storing and/or processing. You should be aware that countries outside the EEA may not offer the same level of data protection as the United Kingdom, however we will take reasonable steps to ensure that your data is treated securely and in accordance with the DPA.

7.2 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:

7.2.1 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.

7.2.2 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.

7.2.3 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 Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

8 DATA SECURITY

8.1 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.

8.2 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.

9 DATA RETENTION

9.1 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.

9.2 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.

- 9.3 Details of retention periods for different aspects of your personal data can be requested from us by contacting us.
- 9.4 In any event, by law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.
- 9.5 In addition, when we rely on the legitimate interest lawful basis to process your data, we will keep the data until that legitimate interest subsists (unless another lawful basis continues to apply).
- 9.6 In some circumstances you can ask us to delete your data: see Request erasure below for further information.
- 9.7 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.

10 **LINKS TO OTHER WEBSITES**

- 10.1 This policy only applies to this website. If you link to another website from here, you should remember to read and understand that website's privacy policy as well. We are not responsible for any use of your personal data that is made by other websites.

11 **HOW USERS CAN CONTACT US**

- 11.1 If you have any questions about this policy, please contact us at sian@businessmindscapes.com or at our postal address, Forest View Drove Lane, Cold Ash, Thatcham, Berks, RG18 9NL.