

Purpose of this privacy notice

This privacy notice provides information on how Hargreaves Services plc, and all its subsidiaries, collects and processes the personal data of our customers and business contacts.

Hargreaves Services plc is the controller and is responsible for your personal data (collectively referred to as “we”, “us”, or “our” in this privacy notice).

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.

The data we collect about you

We collect or use the following information to **provide services to existing and prospective customers, partners and business contacts:**

- Business contact details such as name, title, addresses, telephone numbers, business email addresses occupation, professional membership, accreditations and insurances
- Personal contact details such as name, title, addresses, telephone numbers and personal email addresses
- Gender
- Date of birth
- Payment details (including card or bank information for transfers and direct debits)
- Financial data (including income and expenditure)
- Transaction data (including details about payments to and from you and details of products and services you have purchased)
- Credit history and credit reference information
- Records of meetings and decisions
- Special category data, where applicable, including but not limited to:
 - o Disability information where required to make reasonable adjustments
 - o Religion/religious beliefs where required to accommodate dietary requirements.

Where we get your personal data from

We obtain your personal data directly from you or from publicly available sources.

Our lawful bases for the collection and use of your personal data

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are in carrying out the business activities of the Hargreaves group of companies, and to plan and perform our business relationship with you.

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

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Keeping a record of the services you have subscribed to and delivering services you have requested.
- Communicating with you by telephone, email, fax.
- 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.
- Where we need to comply with a legal or regulatory obligation.

Change of purpose

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 obtain an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us using the details below.

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.

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 law.

Disclosures of your personal data

We will only disclose your personal data to another person or organisation where:

- We need to carry out a credit check in relation to a product, service, contract or potential contract between us. In order to process your application, we will

supply your personal data to credit reference agencies (**CRAs**), and they will give us information about you, such as about your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity. We will also continue to exchange information about you with CRAs on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations. The identities of the CRAs, and the ways in which they use and share personal data, are explained in more detail at <http://www.experian.co.uk/crain/index.html>.

- We need to send the information to persons or organisations that work on our behalf to provide a product, service or contract between us. Where such a person or organisation does work on our behalf, we will ensure that they are contractually required to take appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing and against accidental loss or destruction of, or damage to, personal data and only use the information in order to provide a product or service on our behalf.
- We are required to disclose the information in order to comply with the law or regulatory requirements.

We may also share personal data with other entities in our group as part of monitoring and providing information in relation to the product, services or contract entered into between us.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. 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.

International transfers

The personal data that we collect from you may be transferred outside the United Kingdom. Transfers are permitted under data protection legislation to countries in the European Economic Area (**EEA**) and to countries covered by European Commission adequacy decisions. This means that those countries are deemed to provide an adequate level of protection for your personal data.

Where transfers are made to countries outside the EEA for which an adequacy decision is not in place, to ensure that your personal data does receive an adequate level of protection, we have put in place appropriate measures to ensure that your personal data is treated by those third parties in a way that is consistent with and which respects data protection legislation.

Please contact us if you require further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Data security

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.

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.

Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including any legal, financial, contractual and reporting requirements. We will determine the appropriate retention period for your personal data based on the nature, amount and sensitivity of the personal data obtained by us. We will retain and securely destroy your personal data in accordance with our data retention policy.

CCTV/Surveillance

We have installed CCTV systems in some of our premises for the purposes of public and staff safety and crime prevention and detection.

Body-worn cameras incorporating audio recording are used by staff at some of the sites at which we operate for the purpose of protecting the safety and welfare of our staff.

Images captured by CCTV and body-worn cameras will be kept for no longer than is necessary.

You have the right to see CCTV and body worn camera images/audio recording of you in accordance with data protection laws and be provided with a copy of the images.

We will only disclose images and audio to other bodies who intend to use it for the purposes stated above. Images and audio will not be released to the media for entertainment purposes or placed on the internet for public viewing.

We operate CCTV in accordance with the code of practice issued by the Information Commissioner.

Your legal rights

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

You have the right to:

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.

Changes to this Notice

We may change this notice at any time by amending this page. You are expected to check this page from time to time to take notice of any changes we have made, as they are binding on you. If we make substantial changes in the way we use your personal data, we will notify you by posting a prominent notice on our website.

Contact Details

If you have any questions about how we treat your personal data and protect your privacy, please write to Data Protection Officer, Hargreaves Services plc, West Terrace, Esh Winning, Durham, DH7 9PT, by email dataprotection@hsgplc.co.uk or telephone +44 (0)191 373 4485.

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).