

1. Introduction and general terms

Haywood Associates Ltd (HAL) is committed to protecting any personal information we obtain about you. This Privacy Policy sets out how we obtain, use and protect any personal information you provide to us, whether online, via phone, text, email, in letters or in other correspondence.

This privacy policy explains the following:

- what information HAL may collect about you;
- how HAL will use information we collect about you;
- when HAL may use your details to contact you;
- whether HAL will disclose your details to anyone else;
- your choices regarding the personal information you provide to us;

HAL is committed to safeguarding your personal information. Whenever you provide such information, we are legally obliged to use your information in line with all laws concerning the protection of personal information, including the Data Protection Act 1998 and the Privacy & Electronic Communications (EC Directive) Regulations 2003.

The HAL website and other social media sites contain hyperlinks to websites owned and operated by third parties. These third party websites have their own privacy policies, including policies on their use of cookies, and we urge you to review them. They will govern the use of personal information you submit or which is collected by cookies whilst visiting these websites. We cannot accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

2. Who we are

Haywood Associates Ltd is a microcompany based in the UK providing global IT consultancy, software and systems development services. The registered office is at Summerfield, Gloucester Road, Welland, Malvern, Worcestershire, WR13 6LA, UK. It is a limited company registered at Company's House, number 3525455.

3. What information will HAL collect about me?

When you contact HAL to enquire about our company and our services, offer products or services, or you telephone, email, write to or text HAL, or engage with us via social media channels, we may receive and retain personal information about you. This can consist of information such as your name, email address, postal address, telephone or mobile number, bank account details to process or receive payments. Should your contact be in connection with becoming an associate or an employee, further personal and "sensitive" information such as your CV, tax and financial status, health information and other relevant information may also be requested but only where appropriate and directly relevant and necessary.

By providing these details, you consent to and enable HAL (and where applicable any associates and sub-contractors) to provide you with the goods, services, information, activities or online content for which you have asked.

HAL does not currently use cookies on its website.

HAL has CCTV at its premises which captures images and sound of visitors. There is clear signage to this effect.

4. How will HAL use the information you collect about me?

HAL will use your personal information for a number of purposes including the following:

- in relation to any correspondence you have entered into with us whether by letter, email, text, social media, message board or any other means;
- for "administration purposes", which means that HAL may contact you for reasons related to the purpose of your contact with HAL/your relationship with HAL. e.g. the completion of commercial or other transactions you have entered into with HAL
- for internal record keeping;
- to contact you about any content you provide;
- for marketing purposes;
- to provide you with information about our activities or online content you have agreed to receive;
- to use IP addresses to identify the location of users, to block disruptive use, to establish the number of visits from different countries;
- to analyse and improve the activities and content offered by the HAL website to provide you with the most user-friendly navigation experience. We may also use and disclose information in aggregate (so that no individuals are identified) for marketing and strategic development purposes.
- To develop data management systems and provide architecture solutions for clients who hold your information legitimately for this purpose.
- For security purposes of our premises

5. What lawful basis does HAL process, document and retain information received?

HAL processes information primarily for contract and legal obligations. We also retain information from parties who have indicated an interest in working with us (and so this information is retained on a consent basis). We do not conduct direct marketing campaigns.

We have legitimate interests in processing the data in order to qualify business opportunities and to put together proposals for working together. We also have legitimate interests in processing data provided to us by our clients in order to develop the data management and other systems we have been asked to create. In this instance, the data is viewed and is not retained or downloaded and additional security protocols are applied.

CCTV images are for legitimate security purposes and are solely retained and processed for this purpose. Images are only taken of visitors on HAL premises.

6. Will HAL share my personal information with anyone else?

Information obtained by HAL will be not be shared unless we have your express consent to do so, or are contractually/legally obliged to do so. This could be, for example, for associates being proposed as subcontractors on a tender project submitted by HAL, or to HMRC for tax purposes for employees.

We will only use your information within HAL for the purposes for which it was obtained. HAL will not, under any circumstances, share or sell your personal data with any third party for marketing purposes and you will not receive offers from other companies or organisations as a result of giving your details to us.

We do not need to share your information with "data processors".

We will also comply with legal requests where disclosure is required or permitted by law (for example to government bodies for tax purposes or law enforcement agencies for the prevention and

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detection of crime, subject to such bodies providing us with a relevant request in writing).

7. How long will HAL keep my personal information?

We will hold your personal information on our systems for as long as is necessary for the relevant Activity, or are required to do so by law.

If you request that we stop contacting you we will keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.

CCTV images and sound recordings are kept securely for 30 days only.

8. What is HAL's policy on allowing me to access, update, correct, or delete my personal information?

The accuracy of your information is really important to us. We want to ensure that we are able to communicate with you in ways that you are happy with, and to provide you with information that is of interest.

You have a right to make a "subject access request" to gain access to personal information that we may hold about you. In this case we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from (if not from you)
- Tell you who it has been/will be shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have a right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you wish to access your information, or withdraw consent for us to keep or use your data, or change how we communicate with you, or update the information we hold, then please contact us:

- Email: info@haywood-associates.co.uk
- Write to us at: Sue Haywood, Data Protection Officer, Haywood Associates Ltd, Summerfield, Gloucester Road, Welland, Malvern, Worcestershire, WR13 6LA, UK
- Call us on: +44 (0)7961 144287

Please address requests and questions about this or any other question about this Privacy Policy to the Data Protection Officer, as above.

9. Safety and security

Personal information is processed and stored in our databases and we have taken reasonable steps to secure and protect the information under our control, including establishing processes to prevent unauthorized access or disclosure of this information. However, whilst we make every effort to ensure the security of your information, we are unable to guarantee the protection of the information from misuse, accidental disclosure or unauthorised acts by others.

10. Your Right to lodge a complaint with a Supervisory Body

You have the right to lodge a complaint with a supervisory body should you be dissatisfied with our actions with respect to data held or accessed by us about you. In these circumstances you should contact the UK's Information Commissioners Office: ico.org.uk/make-a-complaint

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11. Changes to HAL's Privacy Policy

This Privacy Policy may be updated from time to time so you may wish to check it each time you submit personal information to HAL. The date of the most recent revisions will appear on this page. If you do not agree to these changes, please do not continue to use our website or submit personal information. If material changes are made to the Privacy Policy we will notify you by placing a prominent notice on the website.

Updated: 7th June 2023

Date for Review: June 2025