

# PRIVACY NOTICE

The Holroyd Howe website is controlled by Holroyd Howe Limited (company number 03319291). We are registered in England and Wales and our registered office is 300 Thames Valley Park Drive, Reading, Berkshire, RG6 1PT.

Holroyd Howe Limited is the controller and responsible for your personal data (collectively referred to as "Holroyd Howe", "we", "us" or "our" in this Privacy Notice).

Holroyd Howe is committed to protecting and respecting your privacy. We take your privacy very seriously and we ask that you read this Privacy Notice carefully as it contains important information on:

- a) the personal data we collect about you;
- b) how we look after your personal data when you visit our website (regardless of where you visit from);
- c) with whom your personal data might be shared; and
- d) your privacy rights and how the law protects you.

## PERSONAL DATA WHICH WE COLLECT

### Personal data provided by you

We collect personal data about you when you:

- a) contact us through our website (including if you fill in the enquiry form);
- b) consent to the use of cookies on our website (as further described below);
- c) register to our recruitment portal and/or apply for a job with us.

The personal data collected in the above manner may include your:

- a) full name;
- b) postal address;
- c) email address;
- d) telephone number;
- e) CV, covering letter and other application details; and/or
- f) enquiry information.

### Special categories of personal data

We do not proactively collect personal data considered as special category personal data via our website such as health information (e.g. allergen information). However, we ask the school to provide any allergen information so that we can cater appropriately for the student. We can only use this information if the school has obtained the explicit consent from the student's parent or legal guardian and has explained why it is being requested.

We do not ask for any special categories of personal data to be disclosed to us as part of your job application process via our website. Depending on the nature of the role,

we may have to conduct further checks at a later stage and where those checks involve special categories of personal data, we will explain why we need that information and how we intend to use it in our recruitment and selection privacy policy.

### Personal data about other individuals

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his or her behalf and has agreed that you can:

- a) give consent on his/her behalf to the processing of his/her personal data;
- b) receive on his/her behalf any data protection notices; and
- c) give consent to the transfer of his/her personal data outside the United Kingdom (“**UK**”) and European Economic Area (“**EEA**”)

### MONITORING AND RECORDING COMMUNICATIONS

We may monitor and record communications with you (such as emails) for the purpose of quality assurance, fraud prevention and compliance activities.

### HOW WE USE YOUR PERSONAL DATA

Under data protection law, we can only use your personal data if we have a legal basis, e.g.:

- a) where you have given **consent**;
- b) to comply with our **legal and regulatory obligations**;
- c) for the performance of a **contract** with you or to take steps at your request before entering into a contract; or
- d) for our **legitimate interests** or those of a third party, unless there is a good reason to protect your personal data which overrides those legitimate interests. When relying on this legal basis, we will carry out an assessment to balance our interests against yours.

The table below explains what we use your personal data for and why:

What we use your personal data for	Our legal basis
Process any orders for goods and/or services which you make with us	Performance of a contract with you or to take to enter into a contract at your request
Assist you with your queries in relation to our business and/or venues	Performance of a contract with you or to take steps at your request before entering into a contract
Review any job applications you submit to us	Performance of a contract with you or to take steps at your request before entering into a contract
Detect and prevent fraud	Compliance with our legal and regulatory obligations
Customise our website and its content to your particular preferences	Consent (where we are not required to obtain your consent and do not do so, for our legitimate interests i.e. to provide you with information (as a prospect or existing customer) we consider may be useful to you))

Notify you of any changes to our website or to our services that may affect you	Compliance with our legal and regulatory obligations
Provide you with marketing materials and information about our business and services	Consent (where we are not required to obtain your consent and do not do so, for our legitimate interests i.e. to provide you with information (as a prospect or existing customer) we consider may be useful to you))
Develop and improve our website, business and services	Consent (where we are not required to obtain your consent and do not do so, for our legitimate interests i.e. to provide you with information (as a prospect or existing customer) we consider may be useful to you))

**WHEN WE MIGHT SHARE YOUR PERSONAL DATA WITH THIRD PARTIES**

We do not, and will not, sell any of your personal data to any third party - including your name, address, email address or payment card information. As an essential part of being able to provide our services to you, we do share your data with the following categories of third parties:

- a) service providers that help us to run our business such as, website hosting providers, website developers;
- b) professional advisers including lawyers, bankers, auditors and insurers who provide advice to us when we require it;
- c) law enforcement agencies in connection with any investigation to help prevent unlawful activity; and
- d) 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.

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. If you would like any more information about the third parties which we work with to provide our services to you, please contact us on the contact details provided below.

**HOW WE ASK FOR CONSENT**

In those cases where we need your consent to hold and process your personal data, we will ask you to check a box on any form requiring consent. By checking these boxes you are confirming that you have been informed as to why we are collecting the information, how this information will be used, for how long the information will be kept, who else will have access to this information and what your rights are as a data subject (all of which is set out in this Privacy Notice).

## HOW WE KEEP YOUR PERSONAL DATA SECURE

To protect your information, we have policies and procedures that ensure only authorised personnel can access the information, that information is handled and stored in a secure and sensible manner, and all systems that can access the information have the necessary security measures in place.

All employees, contractors and sub-contractors receive the necessary training and resources to ensure they understand their responsibilities concerning our policies and procedures.

In addition to these operational measures, we also use a range of technology and security systems to reinforce these policies and procedures, including ensuring that:

- a) access to personal data is strictly restricted to those employees who need to access this information as part of their role;
- b) we store your personal data on secure servers and unauthorised external access to personal data is prevented through the use of a firewall; and
- c) payment details are encrypted using SSL technology (typically you will see a lock icon or green address bar (or both) in your browser when we use this technology).

To ensure these measures are suitable, we run regular vulnerability tests and audits to identify areas of weakness and non-compliance; these tests are routinely scheduled.

## HOW LONG DO WE KEEP YOUR PERSONAL DATA

We shall only retain your information 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. If you would like more information about how long we retain specific types of your information, please contact us on the contact details provided in this Privacy Notice.

## TRANSFERS OF YOUR PERSONAL DATA OUT OF THE UK and EEA

All information you provide via our website is stored on our secure servers within the UK and EEA. If any data that we collect from you is transferred to, or stored at, a destination outside the UK and EEA at any time, we will update this Privacy Notice accordingly.

## YOUR RIGHTS

### **The right to access information we hold about you**

At any point you can contact us to request the information we hold about you as well as why we have that information, who has access to the information and where we got

the information. Once we have received your request we will respond within 30 days.

### **The right to correct and update the information we hold about you**

If the information we hold about you is out of date, incomplete or incorrect, you can inform us and we will ensure that it is updated.

### **The right to have your information erased**

If you feel that we should no longer be using your information or that we are illegally using your information, you can request that we erase the information we hold. When we receive your request, we will confirm whether the information has been deleted or tell you the reason why it cannot be deleted.

### **The right to object to processing of your information**

You have the right to request that we stop processing your information. Upon receiving the request, we will contact you to tell you if we are able to comply or if we have legitimate grounds to continue. If data is no longer processed, we may continue to hold your information to comply with your other rights.

### **The right to ask us to stop contacting you with direct marketing**

You have the right to request that we stop contacting you with direct marketing.

### **The right to data portability**

You have the right to request that we transfer your information to another controller. Once we have received your request, we will comply where it is feasible to do so. For your security we may need to verify your identity before we process your instructions above.

### **The right to withdraw consent**

If you have provided us with your consent to use your personal data, you have a right to withdraw that consent at any time. You may withdraw your consent by contacting us. For further information on each of those rights and/or if you would like to exercise any of those rights including the circumstances in which they do and do not apply, please contact us on the contact details provided below.

## **COOKIES AND TRACKING**

### **Use of cookies**

A cookie is a small text file which is placed onto your device when you access our website. We use cookies on this website to:

- a) recognise you whenever you visit this website (this speeds up your access to the website as you do not have to log in each time);

- b) obtain information about your preferences, online movements and use of the internet;
- c) carry out research and statistical analysis to help improve our content, products and services and to help us better understand our customer requirements and interests;
- d) target our marketing and advertising campaigns more effectively by providing interest-based advertisements that are personalised to your interests; and
- e) make your online experience more efficient and enjoyable.

In most cases we will need your clear, freely given, specific and informed consent in order to use cookies on this website. The exception is where the cookie is essential, meaning that it is required to ensure that the website functions properly.

### **Consent to cookies**

We will always ask for your permission to place cookies or other similar technologies on your device when you first visit our website, except where they are essential for us to provide you with a service that you have requested. You can withdraw any consent to the use of cookies or manage any other cookie preferences by using the cookies preference tool on our website. If you do this, please be aware that you may lose some of the functionality of this website.

For further information about cookies and how to disable them please go to the Information Commissioner's webpage on cookies: (<https://ico.org.uk/for-the-public/online/cookies/>).

### **Description of cookies**

We use the following cookies and other technologies:

- **Essential:** These cookies are essential to the operation of our website and cannot be switched off.
- **Analytics:** These cookies allow us to have a better understanding of how our website is performing in terms of statistics, engagement level, content relevance and ease of navigation. We use this information to help improve our website's functionalities and content as well as your browsing experience.
- **Advertising:** These cookies may be set by third parties. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites, based on uniquely identifying your browser and internet device and recording your visit to our website, the pages you have visited and the links you have followed.

The table below provides some information on the cookies which we use on our website:

Type of Cookie	What it does	Why is it used	How long it lasts
_ga	Google Analytics	To distinguish individual users on your domain	2 years
_ga_7QCSPSKLRV	Google Analytics	to distinguish unique users by assigning a randomly generated number as a client identifier	2 years
_gid	Google Analytics	to distinguish individual users on your domain	24 hours
_gat_gtag_UA_65128214_1	Google Analytics	to throttle the request rate – i.e. limit the collection of data on high traffic sites	10 minutes
GRECAPTCHA	Google reCaptcha	used with reCaptcha on our contact form. Does not track users, rather its function is to protect against SPAM	6 months

### TAKE CARE WHEN LINKING TO OUR SOCIAL MEDIA SITES

Our website provides links to our social media sites. Once you are on any of these social media sites, please take care if you choose to post any information as this will be on a public domain and may be widely accessible. If you would like more information about how any information posted on these sites will be used, please read the sites' privacy notice carefully.

### HOW TO COMPLAIN

Please contact us if you have any queries or concerns about our use of your personal data (see "Contacting us" below). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO) directly. Further information, including contact details, is available at <https://ico.org.uk>.

### CONTACTING US

If you have any queries about this Privacy Notice, need further information about how we use your personal data or wish to lodge a complaint, please contact us by any of the following means:

- email us at: [dataprotection@wshlimited.com](mailto:dataprotection@wshlimited.com)
- write to us at: Holroyd Howe, Early West, 300 Thames Valley Park Drive, Reading, Berkshire, RG6 1PT
- contact us using our "Get in Touch" page on the website.

### **CHANGES TO THIS PRIVACY NOTICE**

We may change this Privacy Notice from time to time. You should check this Privacy Notice occasionally to ensure that you are aware of the most recent version that will apply each time you access the website.

This Privacy Notice was last updated on 26<sup>th</sup> May 2023