Pragmatic Consultancy Limited

PRIVACY POLICY

Pragmatic Consultancy Limited ("We") are committed to protecting and respecting your privacy. This policy (together with our Terms of Use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

What is the purpose of this privacy notice?

This privacy notice aims to give you information on how we collect and process your personal data through this website, including any data you may provide when you download any information or interact with our online services or enquire about our services.

This website is not intended for children, and we do not knowingly collect data relating to children.

You must read this privacy notice and any other privacy notice we may provide on specific occasions when we collect or process 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.

Data controller(s)

For the Data Protection Act 2018 (the Act), inclusive of GDPR, the data controller Pragmatic Consultancy Limited is the controller and responsible for your personal data (collectively referred to as “Pragmatic Consultancy Limited", "we", "us" or "our" in this privacy notice). Our contact details are Pragmatic Consultancy Limited registered address: 77 The Cravens, Smallfield, Horley, RH6 9QT and our correspondence address of 8, The Chase, Parkgate, Ballyclare, BT39 0JT. You can email us at bryony@thinkpragmatic.co.uk or call us on 07735376757. For all data matters contact our DPO on bryony@thinkpragmatic.co.uk or call us on 07735376757.

Third-party links outside of our control

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share your data. We do not control these third-party websites and are not responsible for their privacy statements.

When you leave our website, we encourage you to read the privacy notice of every website you visit.

1. THE PERSONAL DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the Information Commissioners Office.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows.

- **Identity Data** includes first name/last name/ username/ title / identity records, such as address/ passport / id.

- **Contact Data** includes billing address / registered address / delivery address / email address and telephone numbers.

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.

If you fail to provide personal data

Where we need to collect your personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

2. HOW WE COLLECT YOUR PERSONAL DATA

We will collect and process the following data by the data subject ("You") including.

1. completing a contact form either personally or via website or social media
2. corresponding with us by phone, e-mail or otherwise.
3. the information you provide when you complete a form, request a service such as placing an order, enter a competition, promotion or survey or participate in any interactive aspects by engaging in forums or submitting comments about Pragmatic Consultancy Limited services and products and when you report a problem directly to Pragmatic Consultancy Limited.

The information you give us may include your name, address, e-mail address, phone number and/or personal description.

- **Directly.** 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,

    - Apply for our products or services.
    - Request a download on our website;
    - Subscribe to our service or any social media links
    - Request marketing to be sent to you.
    - Establishing a contract either as a Client or a Consultant

3. HOW WE USE YOUR PERSONAL DATA

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.

- **Performance of Contract** this means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering such a contract.

- **Legitimate Interest** this means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting our DPO (Data Protection Officer) on bryony@thinkpragmatic.co.uk or call us on 07735376757.

- **Comply with a legal or regulatory obligation** this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

4. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, with the legal bases we rely on to do so.

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. Please contact our DPO on bryony@thinkpragmatic.co.uk or call us on 07735376757, if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	**Type of data**	**Lawful basis for processing including basis of legitimate interest**
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
to carry out our obligations arising from any contracts entered into between you and us	(a) Identity (b) Contact	Performance of a contract with you
provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about	(a) Identity (b) Contact	Performance of a contract with you
to make suggestions and recommendations to you	(a) Identity (b) Contact	Performance of a contract with you

to notify you about changes to our service	(a) Identity (b) Contact	Performance of a contract with you
to invoice and receive payment for the services provided including details for payment	(a) Identity (b) Contact (c) Payment details	Performance of a contract with you

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising and these are through Opt in and Opt out services provided as well as updating your preferences on marketing.

We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

Purpose/Activity	**Type of data**	**Lawful basis for processing including basis of legitimate interest**
Newsletters and Blogs and Information sharing about services	(a) Identity (online) (b) Contact	Opt-in services include online services such as Kartra, LinkedIn, following our Blog or social media pages using your personal or company identity.
Extension to an existing contract	(a) Identity (b) Contact	Performance of a contract with you and additional services that can be further supported by Pragmatic outside of the initial scope of work, and will be communicated by email and discussed through follow up – keep in touch calls
Referrals	(a) Identity (b) Contact	Due to the nature of the industries that we cover we may often have a direct referral and we will endeavour to be introduced by the referrer prior to seeking direct contact.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you 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.

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside of Pragmatic Consultancy Limited for marketing purposes and where external consultants have been directly used to support products and services, your contact details have remained under the ownership of Pragmatic Consultancy Limited unless where direct contact with the end Client has been established outside the direct control of Pragmatic Consultancy Limited.

We do not share any customer information with internal or external parties who may wish to market their products to you. We will however share information when requested to do so for lawful disclosure to the relevant competent authority.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt out links on any of the marketing messages sent to you or by unfollowing or removing your contact details through the relevant social media channels.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product and/or service purchase, contract extension or other transactions.

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 get an explanation as to how the processing for the new purpose is compatible with the original purpose, please our DPO on bryony@thinkpragmatic.co.uk or call us on 07735376757.

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.

5. WHO WE SHARE YOUR PERSONAL DATA WITH

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties including Consultants who are contracted to work for Pragmatic Consultancy Limited in specific expert roles
- External Third Parties Service.
    - Providers acting as processors who provide IT and System Administration Services that include but not limited to Microsoft, Wordpress and Kartra to which our websites are held.
    - Professional advisers acting a processors or joint data controllers including lawyers, bankers, auditors and insurers based within the United Kingdom who provide consultancy, Banking, Legal, Insurance and Accounting services.
    - HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require report of processing activities in certain circumstances.
    - 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.

6. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (EEA). The data that we collect from you will be transferred to and stored at, a destination inside the European Economic Area ("EEA"). We will take all steps reasonably necessary to ensure that your data is held as determined by Pragmatic Consultancy Limited privacy policy.

We seek to protect your information from unauthorised access by taking the following steps:

1. Firewall
2. Encryption
3. Password Protected

8. DATA RETENTION

By law we have to keep basic information about our customers including contact, identity, financial and transactional data for six years after they cease being a customer for tax purposes.

In some circumstances you can ask us to delete your data: see **Your legal rights** below for further information.

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.

7. 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.

8. YOUR LEGAL RIGHTS

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you.
- The right to request that we correct any personal data if it is found to be inaccurate or out of date.
- The right to request your personal data is erased where it is no longer necessary to retain such data.
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data.
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable 9i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please please in the first instance contact our DPO, bryony@thinkpragmatic.co.uk , phone on 0773376757 or write to us at our business correspondence address: Pragmatic Consultancy Limited 8, The Chase, Parkgate, Ballyclare, BT39 0JT.

No fee required – with some exceptions

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 admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

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.

Time limit to respond

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.

9. CHANGES TO THIS NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This Privacy Policy was last updated on 08/07/2023 and the historic versions can be obtained by request through to contact our DPO, bryony@thinkpragmatic.co.uk.

Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current.

10. QUERIES, REQUESTS OR CONCERNS

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact our DPO, bryony@thinkpragmatic.co.uk , phone on 0773376757 or write to us at our business correspondence address: Pragmatic Consultancy Limited 8, The Chase, Parkgate, Ballyclare, BT39 0JT.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners Office on 03031231113 or via email https://ico.org.uk/global/contact-us/email/ or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.