

WEBSITE PRIVACY POLICY

BACKGROUND:

The HR Point Ltd understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, www.thehrpoint.co.uk ("Our main Site") and all our other websites; and will only collect and use personal data in ways that are described here, and in a manner, that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

"Account"	means an account required to access and/or use certain areas and features of Our Site;
"Cookie"	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 13, below;
"Cookie Law"	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
"personal data"	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR"); and
"We/Us/Our"	means The HR Point Ltd, a limited company registered in England under company number 07987659, whose registered address is 2/4 Ash Lane, Rustington, Littlehampton, West Sussex, BN16 3BZ, United Kingdom.

2. Information About Us

- 2.1 Our Site is owned and operated by The HR Point Ltd, a limited company registered in England under company number 07987659, whose registered address is 2/4 Ash Lane, Rustington, Littlehampton, West Sussex, BN16 3BZ, United Kingdom.
- 2.2 Our VAT number is 131 9637 12.
- 2.3 Our Data Protection Officer is Nicky Gleadow, and can be contacted by email at 783583nicky@thehrpoint.co.uk by telephone on 01903 680900, or by post at 2/4 Ash Lane, Rustington, Littlehampton, West Sussex, BN16 3BZ, United Kingdom

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the

privacy policies of any such websites before providing any data to them.

4. Your Rights

- 4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:
 - 4.1.1 The right to be informed about Our collection and use of personal data;
 - 4.1.2 The right of access to the personal data We hold about you (see section 12);
 - 4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 14);
 - 4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 14);
 - 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
 - 4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
 - 4.1.7 The right to object to Us using your personal data for particular purposes; and
 - 4.1.8 Rights with respect to automated decision making and profiling.
- 4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.
- 4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

5. What Data Do We Collect?

Depending upon your use of Our Site, we may collect some or all of the following personal and non-personal data (please also see section 13 on Our use of Cookies and similar technologies)

- 5.1 Full Name;
- 5.2 Full Invoice Address;
- 5.3 Business/Company name;
- 5.4 Job Title;
- 5.5 Contact information such as email addresses and telephone numbers;
- 5.6 Company information such as employee numbers

6. How Do We Use Your Data?

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.
- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by purchasing a product or service from us), or because it is in Our legitimate interests. Specifically, we may use your data for the following purposes:

- 6.2.1 Providing and managing your Account;
 - 6.2.2 Supplying Our products and services to you (please note that We require your personal data in order to enter into a contract with you);
 - 6.2.3 Personalising and tailoring Our products and services for you;
 - 6.2.4 Replying to emails from you;
 - 6.2.5 Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience;
- 6.3 With your permission and/or where permitted by law, we may also use your data for marketing purposes which may include contacting you by email, telephone or post with information, news and offers on Our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- 6.4 Third parties (Google Analytics) whose content appears on Our Site may use third party Cookies, as detailed below in section 13. Please refer to section 13 for more information on controlling Cookies. Please note that We do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.
- 6.5 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- 6.6 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):
- 6.6.1 All data collected as listed in section 5 will be retained for 7 years after the contract ended;

7. How and Where Do We Store Your Data?

- 7.1 We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.
- 7.2 Your data will only be stored in the UK, we store data through Microsoft 365, which we believe is GDPR compliant, we will also store your contact details in Xero (our accounts package) so we can invoice you for the services and products purchased and for tax reporting purposes.
- 7.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.
- 7.4 Steps We take to secure and protect your data include:
- 7.4.1 Data from the website is stored on our secure server. We only take data from the website to fulfil a customers enquiry / order.

8. Do We Share Your Data?

8.1 We do not share your personal data with third parties, other than when you have agreed to purchase additional services via use with one of the businesses we are partnered with. It is our understanding the third parties we partner with are GDPR compliant.

- 8.1 The third party data processors used by Us and listed below are located within the UK.
 - 8.1.1 Xero – our accounts package;
 - 8.1.2 Breathe HR – one of our partners who offer a cloud based HR System, we will only provide your details to Breathe HR where you have requested a trial of the software, you have purchased a subscription to Breathe HR or purchased a package from us which includes access to Breathe HR.
 - 8.1.3 Thomas International – who provide a variety of psychometric and other online assessments. We will only pass details on to them when you have requested one of their assessments to be carried out.
 - 8.1.4 Bespoke Accountancy – our accountants, who we will provide details as required to enable them to prepare the Company accounts.
- 8.2 In certain circumstances, we may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

9. What Happens If Our Business Changes Hands?

- 9.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.
- 9.2 In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.

10. How Can You Control Your Data?

- 10.1 In addition to your rights under the GDPR, set out in section 4, when you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, we aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details and by managing your Account).
- 10.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note,

however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

11. Your Right to Withhold Information

- 11.1 You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

12. How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details at nicky@thehrpoint.co.uk, or using the contact details below in section 14.

13. Our Use of Cookies

Our website does not currently contain cookies.

14. Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at nicky@thehrpoint.co.uk, calling 01903 783584 or by writing to us at the address above.

. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12, above).

15. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

Date : 12 June 2018