

## **UCL Consultants (UCLC) Privacy Policy**

For the purposes of applicable data protection and privacy laws, UCL Consultants Limited ("**UCLC**", "**us**", "**we**"), with its registered offices at 2<sup>nd</sup> Floor The Network Building, 97 Tottenham Court Road, London W1T 4TP, is considered the "Controller" in respect of the Personal Data that it collects, uses and manages in accordance with this Privacy Policy ("**Policy**").

Protecting your privacy is important to UCLC. We are committed to protecting all Personal Data provided to UCLC, whether by individuals with whom we do business, visitors to and users of our websites or otherwise. Personal Data is information which relates to an identified or identifiable living individual.

This Policy explains what Personal Data we collect, how we may use and manage it and the rights you have in relation to your Personal Data. Before you provide us with any Personal Data or browse our websites, you should read through this Policy in full and make sure that you are comfortable with our privacy practices.

Please note that our websites may contain links to other websites, operated by third parties. These third party sites are not subject to this Policy and we recommend that you check the privacy and security policies of each website that you visit. We are only responsible for the privacy and security of the Personal Data that we collect and have no control over the actions of any third parties in relation to your Personal Data.

Please refer to the Glossary below for an explanation of the defined terms in this Policy.

### **Whose Personal Data do we collect?**

UCLC collects Personal Data from a range of individuals in the context of its business activities, including:

- representatives of our suppliers, customers and other business contacts;
- consultants and contractors;
- users of our websites;
- individuals who contact us by any means; and
- job applicants.

### **How we collect your Personal Data**

We obtain Personal Data which you knowingly and voluntarily disclose to us, both in an online and offline context. We collect Personal Data when you:

- visit our websites and / or complete one of our web forms;
- communicate with us in any other way;
- complete surveys issued by us; and
- visit our premises.

We may also collect information received by us from third party sources, for example relating to your use of other websites which we operate and from related third parties such as sub-contractors.

### **What Personal Data we collect**

UCLC may collect a range of Personal Data from you in a business context, such as your name, gender, job title, nationality, photographic identification, email address, home address

and other contact details, details of your business and other interests, communications with you (including notes from meetings) and financial and payment information.

When you use our websites, we collect certain standard information that is sent by your browser to our websites. This includes technical information, such as your IP address, browser type, operating system, language, time zone setting, access times and any referring website addresses.

Special category personal data, eg personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, health or medical conditions, genetic or biometric information and sexual orientation, may be processed by UCLC if such processing is necessary to comply with laws and regulations or where you consent for us to do so. For example, you may opt to provide us with certain Personal Data relating to your health when you submit a copy of our Equal Opportunities Classification Form.

### **The purposes for which we process your Personal Data**

We process your Personal Data for the following purposes:

- to provide you with information and services requested by you;
- to improve the services that we offer, and the events that we manage and host;
- to administer our websites and help improve our services;
- to carry out analytics in relation to the use of our websites;
- to notify you about changes to our websites;
- to manage our internal recruitment processes;
- to carry out payment procedures for consultancy related services;
- to enable us to monitor the implementation and impact of our equal opportunities policy;
- to comply with applicable laws and regulations; and
- other business-related purposes, including negotiating, concluding and performing contracts, administering payments made to us, managing accounts and records, supporting corporate social responsibility activities, legal, regulatory and internal investigations and debt administration.

### **Recruitment**

When you apply for a job via our websites or otherwise, we will collect additional more specific Personal Data about you, such as your qualifications, career history, third party references and interview notes. We may also ask you for other information, for example your interests and the types of jobs you are interested in. Any Personal Data you provide to UCLC in relation to a job vacancy will be processed in accordance with our [Recruitment Notice](#).

### **The legal basis for UCLC processing your Personal Data**

In order to comply with applicable data privacy laws, UCLC is required to set out the legal basis for the processing of your Personal Data. In accordance with the purposes for which we collect and use your Personal Data, as set out above, the legal basis for UCLC processing your Personal Data will typically be one of the following:

- your consent;
- the performance of a contract that we have in place with you or other individuals;
- UCLC or our third parties' legitimate interests; or
- compliance with our legal obligations.

### **Who we share your Personal Data with**

UCLC may share your Personal Data with people within the company who have a “need to know” that data for business or legal reasons, for example, in order to carry out an administrative function such as processing an invoice, or to direct a query that you have submitted to the relevant department within UCLC.

We may disclose your Personal Data to third parties including the authorities, UCLC's advisors, suppliers of IT services and third parties engaged by UCLC for the purpose of providing services requested by you; to protect any intellectual property rights in any materials displayed on or otherwise available from UCLC's websites; for the purposes of seeking legal or other professional advice; to respond to a legal request or comply with a legal obligation.

We may disclose your Personal Data to third parties in the event that we sell, buy or merge any business or assets, including to the prospective seller or buyer of such business or assets.

We may share the Personal Data you submit to us with any entity within the UCL group. These entities are required to maintain the confidentiality of your data and are restricted from using it for any purpose other than the purposes set out in this Policy.

We may decide to allow users to share comments, posting, testimonials, or other information. If you choose to submit such information to us, the information that you submit may be available generally to the public. Information that you provide in these areas may be read, collected, and used by others who access them.

Finally, we may share non-Personal Data with other third parties that are not described above. When we do so we may aggregate or de-identify the information so that a third party would not be likely to link data to you, your computer, or your device. Aggregation means that we combine the non-Personal Data of numerous people together so that the data does not relate to any one person. De-identify means that we attempt to remove or change certain pieces of information that might be used to link data to a particular person.

### **Transfers of Personal Data**

Please note that any person to whom UCLC may disclose your Personal Data under this Policy may be situated in a country other than your own and that such country may provide a lower level of data protection requirements than your own country. By agreeing to this Policy, you consent to the transfer of your Personal Data to a country other than your own.

Whenever we transfer Personal Data across borders, we take legally required steps to ensure that adequate safeguards are in place to protect your Personal Data and to make sure it is treated in accordance with this Policy. If you are located in the EEA or the UK, you can request a copy of the safeguards which we have put in place to protect your Personal Data and privacy rights in these circumstances, using the contact details set out in the ‘Questions and complaints’ section below.

### **Security**

UCLC takes all reasonable technical and organisational security measures to protect Personal Data from accidental or unlawful destruction, accidental loss and unauthorised access, destruction, misuse, modification or disclosure. We do our best to protect your Personal Data but unfortunately the transmission of information over the internet is not completely secure. We cannot guarantee the security of your Personal Data and any transmission of your data to UCLC is at your own risk.

If we have given you (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We

ask you not to share this password with anyone. If you fail to keep your password confidential and this leads to a breach of security, we cannot be held accountable for the loss or other compromising of any Personal Data belonging to you.

## **Cookies**

Our websites use cookies to improve your user experience. For detailed information on the cookies we use and the purposes for which we use them please see our [Cookie Policy](#).

## **Records retention**

Your Personal Data is not kept for longer than is necessary for the purposes for which it is collected. This means that data and records (including Personal Data) are destroyed or erased from our systems when no longer required. The amount of time that records are kept for varies depending upon the type of Personal Data they contain.

## **Your rights**

- Data protection legislation gives rights to individuals in respect of Personal Data that organisations hold about them. Under certain circumstances, you may have the following rights in relation to your personal data: Right 1: A right to access personal data held by us about you (please see section entitled "How can I access my personal information" below).
- Right 2: A right to require us to rectify any inaccurate personal data held by us about you.
- Right 3: A right to require us to erase personal data held by us about you. This right will only apply where, for example, we no longer need to use the personal data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your personal data based on your consent; or where you object to the way we process your data (in line with Right 6 below).
- Right 4: A right to restrict our processing of personal data held by us about you. This right will only apply where, for example, you dispute the accuracy of the personal data held by us; or where you would have the right to require us to erase the personal data but would prefer that our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose we collected it for, but we require the data for the purposes of dealing with legal claims.
- Right 5: A right to receive personal data, which you have provided to us, in a structured, commonly used and machine readable format. You also have the right to require us to transfer this personal data to another organisation.
- Right 6: A right to object to our processing of personal data held by us about you.
- Right 7: A right to withdraw your consent, where we are relying on it to use your personal data.

Right 8: A right to ask us not to use information about you in a way that allows computers to make decisions about you and ask us to stop. please submit your written request to our Data Protection Representative via [dataprotection@uclconsultants.com](mailto:dataprotection@uclconsultants.com). We ask that you always inform us of changes to your Personal Data so that we can keep it up to date.

## **Questions and complaints**

If you have a concern or complaint about this Policy or how UCLC has used your Personal Data, as a first step, you should raise this in writing with UCLC via:

Data Protection Representative  
UCL Consultants Ltd  
The Network Building  
97 Tottenham Court Road  
London  
W1T 4TP  
email: [dataprotection@uclconsultants.com](mailto:dataprotection@uclconsultants.com)

If you are not satisfied with the handling of your concern or complaint by UCLC, you can escalate this to the Information Commissioner's Office, which you can contact using the following details:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113  
[casework@ico.org.uk](mailto:casework@ico.org.uk)

## Changes to this Policy

We reserve the right to modify or amend this Policy at any time by posting the revised Policy on our websites. It is your responsibility to review the Policy every time you submit information to us.

## Glossary

<b>Controller</b>	A party that determines the purposes and means of data processing.
<b>Data Protection Authority</b>	The relevant supervisory authority with responsibility for privacy or data protection matters in the jurisdiction of UCLC and/or UCLC affiliates.
<b>European Economic Area (EEA)</b>	The EEA includes all European Union member states and Iceland, Liechtenstein and Norway.
<b>Personal Data</b>	Information which relates to an identified or identifiable individual (i.e. data about UCLC employees, contractors, applicants, employees of vendors and suppliers, contractors, customers and individuals who use our websites or service centres). It includes names, addresses, email addresses, job applications, user account information, and correspondence. Personal Data can also include web browsing information (e.g. data associated with a particular cookie) and IP addresses, when such information can be linked to an individual.
<b>Processing</b>	<i>Doing anything</i> with Personal Data; this includes collecting it, storing it, accessing it, combining it with other data, sharing it with a third party, or even deleting it.

**Policy Updated 24.05.2018**