



Privacy and Transparency Policy

Data Controller - Ingemar Hunnings, Director at Hunnings Consultancy Ltd (hereinafter referred to as HCL). Contact details: ingemar@hunningsconsultancy.co.uk.

Client – shall be shorthand for the Data Subject.

Purposes of Processing - Your data will be processed in order to:

- provide services under contract to you;
- comply with regulatory and other legal obligations;
- Correspond with you and market to you additional services which may be of interest and
- protect HCL against potential claims.

Legal Basis - Your data will be processed on the basis that HCL has a legitimate interest in being able to achieve the aims of processing set out above. Where special category data is provided, the provider of the data warrants that they consent to HCL processing that data or that they have obtained written consent from the data subject.

Personal Data Held - As a minimum, HCL is required to positively identify its clients. This also includes positively identifying a director in the case of a corporate client. In addition, HCL holds whatever information is provided to it by its clients and others. This will rarely include special category data.

Failure to Provide Data – If you fail to provide HCL with the data required you will not receive services or marketing.

Data Sources - HCL obtains most personal data from its clients and those who have indicated that they have an interest in HCL services. HCL also obtains some personal data from other correspondents. HCL also collects some data from publicly available sources (e.g. Companies House).

Recipients - Any data provided by a client is treated as confidential to that client and will only be shared with others in so far as this is necessary in order to provide the services contracted for by the client, to comply with regulatory and other legal obligations and to protect HCL against a potential claim. In order to provide its services, HCL relies on the services of certain data processors. These include secure cloud storage for files and emails. In each case, HCL ensures that data is processed in compliance with this policy.

Third Countries and Safeguards - Other than where required in order to provide services as required in individual client matters, data is rarely sent to third countries. Where it is, the relevant devices are password protected and equipped with tracking and remote wipe software. The devices are personally accompanied.

Retention Period - Data is held until the client requests it's removal.

Data Subject's Rights – Where relevant, you have the right (subject to client confidentiality) to:

- withdraw consent to the processing of your data;
- complain to a supervisory authority regarding the processing of your data (<https://ico.org.uk/>); and
- obtain a copy of the data held on you and to correction of any errors in that data.

Automated Decision Making – None.

Further Details – The Data Controller will provide further details of any of the above on request.