



Privacy and Transparency Policy

We are Hunnings Consultancy Ltd (hereinafter referred to as HCL) and as such we are the Data Controller for the personal data we may collect from you. At HCL we take data protection seriously and as such are committed to comply with all data protection legislation including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Privacy and Electronic Communications Regulation (PECR) and the EU General Data Protection Regulation (EU GDPR)

Our contact details are: ingemar@hunningsconsultancy.co.uk.

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

- answer any questions you may have via our website or other sources
- provide you with information about our services
- 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
- enter into a contractual relationship with you as a supplier or service provider
- protect HCL against potential claims.

Legal Basis for processing

If you are a client or a service provider then we will process your personal data in order to perform our obligations with you

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 and external consultants instructed to assist with the provision of services to its client. 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.

Automated Decision Making – we do not use automated decision making

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

If you have any questions or are unhappy about how we handle your data please contact us at ingemar@hunningsconsultancy.co.uk and we will do our best to resolve things. Should you still be unhappy then you have the right to complain to the Information Commissioner's Office (ICO) at :

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

Helpline number: 0303 123 1113
ICO website: <https://www.ico.org.uk>

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

22nd March 2024