

Independent Audit Limited

Website Privacy Policy

March 2021

INDEPENDENT AUDIT



We ask that you read this website privacy policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and how to contact us and supervisory authorities in the event you have a complaint.

This privacy policy is divided into the following sections:

- Who we are
- Our website
- Our collection and use of your personal information
- Our legal basis for processing your personal information
- The data we collect about you
- Purposes for which we will use your data
- Who we share your personal information with
- International transfer
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- Data retention
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- How to complain
- Changes to this privacy policy
- How to contact us
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#### Who we are

This website is operated by Independent Audit Limited a company registered in England and Wales under company registration number 04373559. Our registered office is at One Glass Wharf, Bristol, BS2 0ZX. We are Board Evaluation and Board Governance Consultants, for more information about us, please see <https://www.independentaudit.com/our-story>

Independent Audit Limited is the controller and responsible for your personal information, collectively referred to as “we”, “us” or “our” in this privacy policy,

#### Our website

This privacy policy relates to your use of our website [www.independentaudit.com](http://www.independentaudit.com) only.

Throughout our website we may link to other websites owned and operated by certain trusted third parties (e.g. to make additional products and services available to you). These other third-party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to these other third-party websites, please consult their privacy policies as appropriate.

#### Our collection and use of your personal information

We collect personal information about you directly when you access our website, register with us, contact us and send us feedback. We collect this personal information from you either directly, such as when you subscribe to our bulletins, contact us via our website, download articles or indirectly, such as your browsing activity when you visit our website (see ‘Cookies’ below).

The personal information we collect about you depends on the particular activities carried out through our website. This information includes:

- your first and second name, email address and contact details
- details of any feedback or comments you give us
- information about the services we provide to you
- your account details, such as username, login details

We use this personal information to:

- create and manage your account with us
- verify your identity
- provide services to you
- customise our website and its content to your particular preferences
- notify you of any changes to our website or to our services that may affect you
- improve our services
- send articles, bulletins and other marketing

This website is not intended for use by children and we do not knowingly collect or use personal information relating to children.

Our legal basis for processing your personal information

When we use your personal information we are required to have a legal basis for doing so. There are various different legal bases on which we may rely, depending on what personal information we process and why.

The legal bases we may rely on include:

- consent: where you have given us clear consent for us to process your personal information for a specific purpose
- contract: where our use of your personal information is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract
- legal obligation: where our use of your personal information is necessary for us to comply with the law (not including contractual obligations)
- legitimate interests: where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal information, which overrides our legitimate interests)

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.



- Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, 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.

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, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

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.

| Purpose/Activity  | Type of Data   | Why we use your information   |
|---|--|---|
| When you register your details with us as a new client  | (a) Identity<br>(b) Contact  | Performance of a contract with you  |
| To manage our relationship with you which will include:<br>(a) Notifying you about changes to our terms or privacy policy<br>(b) Asking you to leave your comments      | (a) Identity<br>(b) Contact<br>(c) Profile<br>(d) Marketing and Communications                               | (a) Performance of a contract with you<br>(b) Necessary to comply with a legal obligation<br>(c) Necessary for our legitimate interests (to keep our records updated and to review comments left on our website).   |
| To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | (a) Identity<br>(b) Contact<br>(c) Technical   | (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)<br>(b) Necessary to comply with a legal obligation |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you                            | (a) Identity<br>(b) Contact<br>(c) Profile<br>(d) Usage<br>(e) Marketing and Communications<br>(f) Technical | Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)   |
| To use data analytics to improve our website, products/services, marketing, customer relationships and experiences  | (a) Technical<br>(b) Usage   | Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)   |
| To make suggestions and recommendations to you about goods or services that may be of interest to you   | (a) Identity<br>(b) Contact<br>(c) Technical<br>(d) Usage<br>(e) Profile                                     | Necessary for our legitimate interests (to develop our products/services and grow our business)   |

| Purpose/Activity | Type of Data                     | Why we use your information |
|------------------|----------------------------------|-----------------------------|
|                  | (f) Marketing and Communications |                             |

Who we share your personal information with

We may share your name and contact details with third party suppliers such as:

- a Microsoft 365;
- b [insert website hosting details]; and
- c Our internal CRM system Hubspot

This data sharing enables them to despatch services you require directly to you.

Some of those third-party recipients may be based outside the United Kingdom and European Economic Area — for further information including on how we safeguard your personal data when this occurs, see ‘International Transfer.’

We will share personal information with law enforcement or other authorities if required by applicable law.

We will not share your personal information with any other third party.

#### International Transfer

Many of our external third parties are based outside the United Kingdom so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

#### Cookies and other tracking technologies

A cookie is a small text file which is placed onto your device (e.g. computer, smartphone or other electronic device) when you use our website. We use cookies on our website. These help us recognise you and your device and store some information about your preferences or past actions.

For further information on cookies, our use of cookies and how to disable them, please see our Cookies Policy (<https://www.independentaudit.com/cookies>)



## Marketing

We would like to send you information about our other **services**, which may be of interest to you. Where we have your consent or it is in our legitimate interests to do so, we may do this by post, email, telephone or text message (SMS).

We will only ask whether you would like us **and other businesses** to send you marketing messages when you tick the relevant boxes when you provide us with your details.

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

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

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

If you have previously agreed to being contacted in this way, you can unsubscribe at any time by:

- contacting us at [info@independentaudit.com](mailto:info@independentaudit.com)
- using the 'unsubscribe' link in emails or 'STOP' number in texts
- writing to us at 107 Cheapside, London, EC2V 6DN

It may take up to 7 days for this to take place.

For more information on your rights in relation to marketing, see 'Your legal rights' below.

## Data retention

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for legal and 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 will 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.

## Your legal rights

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you would like to exercise any of those rights, please:

- email, call or write to our Data Protection Officer
- let us have enough information to identify you (e.g. account reference number, user name, registration details),
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates, including any account or reference numbers, if you have them.

### Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

### How to complain

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). Their helpline number is 0303 123 1113.

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### Changes to this website privacy policy

This website privacy policy was published on 22 March 2021 and last updated on 22 March 2021.

We may change this website privacy policy from time to time, when we do we will inform our clients.

### How to contact us

Please contact Richard Sheath our Data Protection Officer, if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact Richard Sheath, our Data Protection Officer, please send an email to [info@independentaudit.com](mailto:info@independentaudit.com) or write to 107 Cheapside, London, EC2V 6DN or call +44 (0)20 7796 8660.

### Do you need extra help?

If you would like this website privacy policy in another format (for example: audio, large print, braille) please contact us (see 'How to contact us' above).