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## PRIVACY POLICY

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**BY USING OUR WEBSITE OR USING OUR SERVICES AND GIVING YOUR INFORMATION TO US, YOU INDICATE THAT YOU UNDERSTAND HOW WE WILL USE AND PROTECT YOUR PERSONAL DATA AS DESCRIBED IN THIS PRIVACY POLICY**

### **BACKGROUND:**

People Based Solutions 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.peoplebasedhr.co.uk](http://www.peoplebasedhr.co.uk) ("our Site") 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 you enquiring about or entering into a contract for one or more of our Services and your first use of our Site, which you must stop using immediately if you do not accept and agree with this Privacy Policy.

If you provide information about any other person other than yourself, you must ensure that they understand how their information will be used and that you are authorised to disclose it to us, and to consent to its use on their behalf before doing so.

### **1. Definitions and Interpretation**

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

<b>"Company"</b>	"The Company" means People Based Solutions Ltd., a limited company registered in England under company number 08065344, whose registered address is Dallam Court, Dallam Lane, Warrington, Cheshire, WA2 7LT.
<b>"Site"</b>	means our website, <a href="http://www.peoplebasedhr.co.uk">www.peoplebasedhr.co.uk</a> and any landing pages or pages created by us on any social media platforms which direct you to our Site.
<b>"Services"</b>	means one or more of the online services we provide including our HR database, server, document management systems and Help Desk as well as our Portal.
<b>"Portal"</b>	means our dedicated portal for securely uploading and downloading documentation
<b>"Account"</b>	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 and you can see how we use cookies in our Cookie Policy;

**“personal data”**

“Personal data” means any information relating to an identifiable natural person who can be directly or indirectly identified from that information (“the data subject”). This definition shall, where applicable, incorporate the definitions provided in the “GDPR”; and in this case, it applies to personal data disclosed to the Company for the purposes of managing the provision of its services.

“Special category” personal data (also known as “sensitive” personal data). Such data includes, but is not necessarily limited to, data concerning the data subject’s race, ethnicity, politics, religion, trade union membership,

“Privacy Laws” means all applicable privacy and data protection laws including the EU Regulations, General Data Protection Regulation (“GDPR”) and the Privacy and Electronic Communications (EC Directive) Regulation 2003 (as amended), together with the Data Protection Act 2018 and all subordinate legislation, directions of any competent privacy regulator, common law and other relevant court decisions and all relevant privacy and/or data protection codes of practice in each case as may be amended or replaced from time to time.

“Third Parties” are under the direct authority of the Data Controller and are authorised to process personal data on behalf of the Data Controller. They include, but are not limited to: business contacts, contractors and service providers. Please paragraph 2 for details of our Third Parties.

**2. Information About Us and Third Parties**

- 2.1 Our VAT number is 153994572.
- 2.2 Our Data Protection Officer is Sean McCann, and can be contacted by email at smccann@peoplebasedsolutions.com, by telephone on 01925 525957, or by post at Dallam Court, Dallam Lane, Warrington, Cheshire, WA2 7LT.]
- 2.3 We are a member of the Chartered Institute of Personnel Development.
- 2.4 Our Site is operated by Techniframe Ltd., a limited company registered in

England under company number 08936951, whose registered address is Ashland House, Dobson Park Way, Ince in Makerfield, Wigan, WN2 2DX and whose main trading address is Ashland House, Dobson Park Way, Ince in Makerfield, Wigan, WN2 2DX.

- 2.5 Our Site is hosted in the European Union by 123 Reg Ltd, a limited company registered in England under company number 05306504, 5th Floor, The Shipping Building Old Vinyl Factory, 252-254 Blyth Road, Hayes, Middlesex, UB3 1HA
- 2.6 Our Site undergoes analytics services performed by Google Analytics...
- 2.7 Our Electronic contracts stored online in our CRM system which is hosted hosted within the European Union by 123 Reg.
- 2.8 Our client and supplier financial information operated by Quickbooks Online, a limited company registered in England under company number, 2679414, whose registered address is 1 Cathedral Piazza, London, SW1E 5BP and is hosted within the European Union.
- 2.9 Our employee payroll information help and is processed by AIMS accountancy services, a limited company registered in England under company number, 02740695, whose registered address is 3 Park Road, London, NW1 6AS and is hosted within the European Union.

### 3. **What Does This Policy Cover?**

This Privacy Policy applies to:

3.1 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.

3.2 your enquiry into or use of one or more of our Services. The provision of our Services may require the services of third parties listed in section 2. Whilst we have made every effort to verify the data protection procedures of these third parties, we advise you check their Privacy Policies before engaging our Services.

### 4. **Your are 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 and How?**

In order to provide you with the Services you require we may collect your data when communicating with you via email, text message, instant messaging, telephone calls, post or otherwise, including cookies on our Site, (please also see section 13 on our use of Cookies and similar technologies).

We collect some or all of the following personal and non-personal data:

- 5.1 name;
- 5.2 business/company name
- 5.3 job title;
- 5.4 profession;
- 5.5 contact information such as email addresses and telephone numbers;
- 5.6 demographic information such as post code, preferences and interests;
- 5.7 IP address;

## 6. **How Do We Use Your Data?**

- 6.1 We keep and use your personal data in the form of your contact details when you use our services. To maintain the quality of our services, we will also keep and use records of the nature and contact we have with you and the services we have provided. We may, from time to time use this information in order to tailor Our services and inform you of ways we can help. You may on occasion provide us with documentation and information relevant to issues we are advising on. We will retain and use this information to enable us to provide the relevant service to you. We will not disclose any information about individuals from except where We are required by law to do so. For more details on how we share your data, see section 8, below.
- 6.2 All personal data is processed and stored securely, for no longer than is necessary for fulfilling the purposes for which it was first collected and not further processed in a manner that is incompatible with those purposes. 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.
- 6.3 Our use of your personal data will always be lawful, either because it is necessary for Our fulfilment of a contract with you, because you have consented

to Our use of your personal data (e.g. by subscribing to newsletters), or because it is in Our legitimate interests. Specifically, We may use your data:

- 6.3.1 For registration and general administration of your Account (including verification, vetting and security checking);
  - 6.3.2 To provide and administer the products and services you request from Us and any Account you have with Us (which will include tracing and collecting debts and fraud prevention);
  - 6.3.3 To provide and manage your access to Our Site;
  - 6.3.4 To communicate with you in the event that any services requested are unavailable or if there is a query with you requests;
  - 6.3.5 To carry out market research so that we can improve the goods and services we offer;
  - 6.3.6 To personalise and tailor Our products and services to you;
  - 6.3.7 To track and analyse activity on Our Site
  - 6.3.8 To personalise and tailor your experience on Our Site and respect your preferences; and
  - 6.3.9 For record keeping purposes.
- 6.4 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, text message, instant messaging 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 Privacy Laws.
- 6.5 You can withdraw your consent to Us using your personal data for direct marketing purposes at any time, and request that We delete it. To opt-out of receiving direct marketing you can contact [enquiries@peoplebasedsolution.co.uk](mailto:enquiries@peoplebasedsolution.co.uk)
- 6.6 We will continue to use your data in order to fulfil our contract with you and/or where we have a legitimate interest to do so. Without the use of your personal data we will be unable to proceed with the provision of Our services.
- 6.7 We will not keep your personal data for any longer than is necessary for fulfilling the purpose for which it was first collected, nor further process your personal data in a manner that is incompatible with those purposes. We will determine the retention period for your personal data on the following bases:
- 6.7.1 If We, you or your employer terminates the contract for Our services, or your job role no longer requires you to use Our services, you will be entitled to access Our services for three months from the point at which the contract is terminated or We are notified that access is no longer required.
  - 6.7.2 If you are a prospective client We will not keep your details for longer than 12 months from the date on which you submit your data to us for the purposes of entering into a contract;
  - 6.7.3 If you have submitted your personal data for Us to use for direct marketing purposes, we will hold your personal data on our suppression

list and cease all further direct marketing to you; or comply with your request to exercise your right to erasure ('to be forgotten').

## **7. How and Where Do We Store Your Personal 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 consent to keep it.
- 7.2 Your personal data will only be stored within the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein).
- 7.3 Data security is extremely important to Us, and to protect your data We have taken all necessary measures to safeguard and secure data collected through Our online services and Our Site. For further information on the technical and organisational measures we have taken, please refer to Our Data Protection Policy.

## **8. Do We Share Your Data?**

- 8.1 Subject to section 8.2, We will not share any of your personal data with any third parties for any purposes other than when it is necessary for the performance of Our contract to provide Our Services to you.
- 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 obligations, we are compelled to do so by a court order, or we are required to disclose your personal data to a governmental authority.
- 8.3 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

## **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).

- 10.2 You may also wish to sign up to one or more of the preference services operating in the UK which block companies from sending you unsolicited direct marketing. They are: the Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). Please note, however, that these services will not prevent you from receiving marketing communications that you have positively opted-in to receive.

## 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.

11.2 You may restrict Our use of Cookies. For more information, see section 13

## 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 [enquiries@peoplebasedsolutions.co.uk](mailto:enquiries@peoplebasedsolutions.co.uk) or using the contact details below in section 14.

## 13. **[Our Use of Cookies**

13.1 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve our Services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data are protected and respected at all times.

13.2 All Cookies used on Our Site are used in accordance with current Cookie Law.

13.3 Before Cookies are placed on your computer or device, you will be shown a pop up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.

13.4 Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown below in section 13.5. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below in section 13.9, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

13.5 The following first party Cookies may be placed on your computer or device:

<b>Name of Cookie</b>	<b>Purpose</b>	<b>Strictly Necessary</b>
_pk_id.49.44d9	To allow connection	Yes
catAccCookies	Record that the user accepts the fact that the site uses cookies.	Yes
ms-session	Allows the user proceed through many pages of a site quickly and easily without having to authenticate or reprocess each new area they visit.	Yes
ms-uid	To facilitate browsing	Yes
wp-settings	This is used to customize the user's view of admin interface, and possibly also the main site interface.	Yes
wp-settings-time	This is used to customize the user's view of admin interface, and possibly also the main site interface.	Yes

13.6 Our Site uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

13.7 The analytics service(s) used by Our Site use(s) Cookies to gather the required information.

13.8 The analytics service(s) used by Our Site use(s) the following Cookies:

<b>Name of Cookie</b>	<b>First / Third Party</b>	<b>Provider</b>	<b>Purpose</b>
ga	third	Google	Expires after 2 years is Used to distinguish users

_gid	third	Google	Expires after 24 hours is Used to distinguish users
_gat	third	Google	Expires after 1 minute. Used to throttle request rate. If Google Analytics is deployed via Google Tag Manager, this cookie will be named _dc_gtm_<property-id>.
AMP_TOKEN	third	Google	Expires after 30 seconds to 1 year. Contains a token that can be used to retrieve a Client ID from AMP Client ID service. Other possible values indicate opt-out, inflight request or an error retrieving a Client ID from AMP Client ID service.
_gac_<property-id>	third	Google	Expires after 90 days. Contains campaign related information.

- 13.9 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- 13.10 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.
- 13.11 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.
- 13.12 For further information on cookie and Flash cookies and how to switch them off see the Information Commissioner's website at [www.ico.org.uk](http://www.ico.org.uk) or visit [www.allaboutcookies.org](http://www.allaboutcookies.org) or [www.aboutcookies.org](http://www.aboutcookies.org)

#### 14. **Contacting Us**

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at [enquiries@peoplebasedsolutions.co.uk](mailto:enquiries@peoplebasedsolutions.co.uk), by telephone on 01925 525 957, or by post at Dallam Court, Dallam Lane, Warrington, Cheshire, WA2 7LT. 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 applicable privacy laws change). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy by continuing to use our Services and on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date since the latest version published on Our Site will supersede any previous versions.