

Background:

The 324 Consultancy understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our clients and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About Us

The 324 Consultancy is a Limited Company registered in England and Wales under company number 12304291.

7 Bell Yard London WC2A 2JR

VAT No. 342209136.

Data Protection Officer: Alex Coburn

Email address: alex.coburn@324consultancy.com

Telephone number: 07736 315 662

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.

The right to access the personal data we hold about you. Part 10 will tell you how to do this.

The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.

The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 11 to find out more.

The right to restrict (i.e. prevent) the processing of your personal data.

The right to object to us using your personal data for a particular purpose or purposes.

The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.

The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.

Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. we would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 11.

5. What Personal Data Do You Collect and How?

We may collect and hold some or all of the personal data set out in the table below, using the methods also set out in the table. We do not collect any 'special category' or 'sensitive' personal data, personal data relating to children or data relating to criminal convictions and/or offences.

Data Collected	How we Collect the Data
Identity Data such as first name, last name, and job title.	Direct Interactions: You may give us your identity data by filling in forms or by corresponding with us by post, phone, email or otherwise, as a result of our Marketing through social media connections or specific requests or by the provision of CV's or other information about yourself for specific purposes e.g. apply for a career opportunity with 324 Consultancy
Contact Data including email address and phone number	Direct Interactions: You may give us your contact data by filling in forms or by corresponding with us by post, phone, email or otherwise, as a result of our Marketing through social media connections or specific requests
Business information including job title or profession.	Direct Interactions: You may give us your business information by filling in forms or by corresponding with us by post, phone, email or otherwise, as a result of our Marketing through social media connections or specific requests
Marketing and Communications Data e.g. preferences for receiving marketing from us and your communication preferences	Direct Interactions and follow up after marketing events: You may give us your business information by filling in forms or by corresponding with us by post, phone, email or otherwise, as a result of

	our Marketing through social media connections or specific requests
Financial Data includes bank account and payment card details	Direct Interactions: You may give us your financial data by filling in forms or by corresponding with us by post, phone, email or otherwise, as a result of our creating you an account/your business with us
Data from third parties e.g. Experian credit check	We may receive identity data from business delivery partners based on information supplier by you as part of our pre-employment screening

6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. We will use your personal data in the following circumstances:

- Where we need to perform the contact we are about to enter into or have entered into with you
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests
- Where we need to comply with legal or regulatory obligation
- Where you have provided your consent to us to use your personal data in a certain way such as direct marketing by email

We have set out in the table below, a description of all the way we plan to use your personal data, and which of the legal bases we rely on to do so.

What we Do	What Data we Use	Lawful Basis
To register you as a new customer	Identity, Contact and Marketing & Communications	Performance of a contract with you

<p>To manage our relationship with you which will include 1) notifying your about changes to our terms or privacy policy 2) asking you to leave a review or take a survey</p>	<p>Identity, Contact and Marketing & Communications</p>	<p>Performance of a contract with you</p> <p>Necessary for our legitimate interests (to keep our records up to date and to study how customers use our products/services)</p> <p>Necessary to comply with a legal obligation</p>
<p>To administer and protect our business</p>	<p>Identity, Contact, Financial, Business Information, Marketing & Communications.</p>	<p>Necessary for our legitimate interests (for running our business, provision of services, network security, to prevent fraud and in the context of a business reorganisation or group restructure exercise)</p> <p>Necessary to comply with a legal obligation</p>

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email **or** telephone with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. we will always work to fully protect your rights and comply with **our** obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. **We** will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

7. How Long Will You Keep My Personal Data?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In general, unless still required in connection with the purpose(s) for which it was collected and/or is processed, we remove your personal data from our records five (5) years after the date it was collected unless different retention periods apply e.g. for job applicants who are not appointed data will only be kept for 12 months. However, if before that date (i) your personal data is no longer required in connection with such purpose(s), (ii) we are no longer lawfully entitled to process it or (iii) you validly exercise your right of erasure, we will remove or anonymise your personal data from our records at the relevant time.

If you request to receive no further contact from us, we will keep some basic information about you on our suppression list in order to comply with your request and avoid sending you unwanted materials in the future.

8. How and Where Do You Store or Transfer My Personal Data?

We will only store your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

We ensure that your personal data is protected under binding corporate rules. Binding corporate rules are a set of common rules which all our group companies are required to follow when processing personal data. For further information, please refer to the [Information Commissioner's Office](#).

The security of your personal data is essential to **us**, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so;
- Security controls such as privileged and identity access management, encryption and multi-factor authentication.

9. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exception:

Our carefully selected partners and service providers may process personal information about you on our behalf as described below:

Digital Marketing Service Providers

We periodically appoint digital marketing agents to conduct marketing activity on our behalf, such activity may result in the compliant processing of personal information. Our appointed data processors include:

Prospect Global Ltd (trading as Sopro) Reg. UK Co. 09648733. You can contact Sopro and view their privacy policy here: <http://sopro.io>.

Sopro are registered with the ICO Reg: Z123456 their Data Protection Officer can be emailed at: dpo@sopro.io.

Experian

For job applicants we will undertake a fit and proper person check. Basic information that you supply will be used to set up the initial check and applicants will be asked by Experian to provide further information.

Experian Ltd is registered in England and Wales (no. 00653331). Registered office: The Sir John Peace Building, Experian Way, NG2 Business Park, Nottingham NG80 1ZZ. Experian are registered with the ICO.

You can contact their Data Protection Officer at uk.dpo@experian.com.

You can view their privacy policy here:

[Privacy Policies | Experian](#)

CV Insight

For job applicants outside of the UK we will undertake a fit and proper person check. Basic information that you supply will be used to set up the initial check and applicants will be asked by CV insights to provide further information.

CV Insight Limited. a company registered in England and Wales under company registration number 5946060 whose registered address is located at 11 King Street, King's Lynn, Norfolk, PE30 1ET. CV Insight is registered with the UK Information Commissioner's Office (Registration Number: Z9572392.)

You can view their privacy policy here:

<https://www.cvinsight.co.uk/privacy-policy-data-protection-notice/>

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the UK, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 8.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover **our** administrative costs in responding.

We will respond to your subject access request within 21 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a

complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details: for attention of Data Protection Officer.

Email address: info@324consultancy.com

Telephone number: 0203 603 4733

Postal Address: 7 Bell Yard London WC2A 2JR.

12. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available via our website. This Privacy Notice was last updated on 31/3/2021.