# consilient

### **Privacy Policy**

#### 1 The impact of the EU General Data Protection Regulation (GDPR)

GDPR came into force on 25 May 2018. The Regulation applies to the processing of personal data in the context of the activities of an establishment of a controller or a processor of personal data in the Union, regardless of whether the processing takes place in the Union or not. It applies to all entities established in the EU regardless of the nationality of the "data subject" whose personal data such entities hold.

GDPR is not focused on specific nationality, instead it applies to the personal data of any natural person located in the EU. It also applies to entities established outside the EU that hold or process personal data of individuals of any nationality who are located in the EU. This EU regulation therefore has global applicability

The Consilient Consultancy Limited (hereinafter referred to as "Consilient" or by use of the terms "we", "us" or "our") is an EU established entity.

Our understanding of an EU data subject in relation to our obligations under GDPR is that a data subject is a citizen of an EU state currently resident in the EU or any other national currently resident in the EU. Our understanding is that our obligations under GDPR do not apply to EU nationals living outside the EU. We use the term "our understanding" because despite the length of the regulation (it extends to 88 pages) it speaks only of "data subjects" and does not define an "EU data subject"

#### 2 Access to our website

You do not need to register with us or supply any personal information to access and browse the Consilient website

#### 3 Use of cookies

We do not currently use cookies. If at some point in the future we begin to use cookies we will amend our privacy policy and a message will appear the next time you access our website to confirm that we have done so

#### 4 What data do we hold about you?

We hold basic information such as your name, email ID, job title, company name, telephone numbers, office address and country location. This information is typically found on a business card or in an email footer

We do not hold any other personal information about you such as gender, date of birth, marital status, family details, banking details or career history (other than if you have supplied this to a third party such as a conference organizer or media company who has then sent this to us by way of an online brochure, email or any other means physical or electronic)

Where required by law, we may need to collect additional personal data such as passport details or national ID details

#### 5 Telephone communications

We do not record telephone calls but evidence of your calls to us or our calls to you may be registered with our telecommunications service provider(s)



#### 6 How do we collect your data?

We collect data by the following means only:

- You have provided us with a business card
- You have actively provided your details either orally, in writing or through an electronic means
- Your details were included in an email communication from you and received by us
- A third party has provided your details to us in which case we assume that you gave your consent to that third party to do so

#### 7 How do we use your personal data?

As a "data controller" as defined in the GDPR we will use the data we hold about you to provide you with offers of services or information that we believe are relevant to you, your company or the economic sector in which you work. Occasionally our communications will offer you services provided by third parties or provide links to their websites

#### 8 Will we share your data?

In order to facilitate our communications, we may use third party communication companies. These companies are known as "data processors" as defined in the GDPR. Where you purchase services from us using a credit or debit card, these details will be passed to a third party known as a "payment processor"

We may give your information to third parties to allow them to market their products and services to you, but only if you specifically ask us to do so

We may disclose your personally identifiable information to a third party if we are running an event in conjunction with that third party, if one of its representatives is speaking at one of our events or if the entity is sponsoring one of our events. In any event we will seek your prior permission to do so

Other than the above we will not sell or pass your personal data that we hold to anyone unless required by law

#### 9 Using your data in website purchase transactions

Credit/debit cards details and personally identifiable information will NOT be stored, sold, shared, rented or leased to any third parties by us. Such details will be collected and may be stored by payment processors acting on our behalf

The website policies and Terms & Conditions may be changed or updated occasionally to meet legal requirements and standards. Therefore customers are encouraged to frequently visit these sections in order to be updated about any such changes on the website. Modifications will be effective on the day they are posted.

Our website has no third party advertising. As such, no third parties will have access to your data other than data processors or payment processors as described in Section 8 above

#### 10 Your consent and the legal understanding between us

By subscribing to our information updates, communicating with us or by asking us to contact you, you understand that you are providing this information to us voluntarily and that we will need to retain your contact information in order to continue the communication or respond to your request. Without the contact information we will not be able to continue a conversation or respond to your request

In order to receive communications from us, you will be asked to opt-in or "subscribe". You will be able to "unsubscribe" at any time. Upon doing so we will delete all personal data that we hold about you

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#### 11 Principles we apply to processing of personal data

We will apply the following principles:

- We will process data lawfully, fairly and in a transparent manner in relation to the data subject
- We will collect data for specified, explicit and legitimate purposes and not for further processing in a manner that is incompatible with those purposes
- We will collect data that is adequate, relevant and limited to what is necessary in relation to the purpose for which it is processed
- We will keep data in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
- We will process data in a manner that ensures appropriate security of the personal data, including
  protection against unauthorised or unlawful processing and against accidental loss, destruction or
  damage, using appropriate technical or organisational measures

#### 12 Your rights

You have the right to

- Have your data updated and amended if it is incorrect, out of date or incomplete
- Restrict the level of processing or object to automated processing
- Know how long we keep your data
- Ask us to erase your data at any point and be forgotten under certain circumstances
- Ask us to provide details of your personal data that we hold
- Ask for the data to be supplied to you in a portable format if appropriate

#### 13 How long do we keep your data?

Your personal data will be retained for the period needed to interact with you or until such time as you request us to delete your data from our records if earlier

#### 14 How to contact us

You can email us if you have any enquiries at <u>privacy policy</u>. To enable us to reply to you, we will need your name and email address