

# Privacy Statement



## Together

We are **Clemark Group**,

Registered in England & Wales under **Associate Enterprises Limited** and including all wholly owned subsidiaries. We also trade as Assent, Lorators, Clemark.

Our integrated management system covers the provision of consultancy, auditing, training, creative, technology and other professional services delivered in-person and remotely to ensuring the quality of products/services and the security of all information.

## PRIVACY STATEMENT

Associate Enterprises Limited trade as "Clemark", "Assent", "Lorators".

### 0. Introduction

Associate Enterprises Limited takes your privacy and the security of data very seriously. This statement sets out our approach to protecting your data and complying with the Data Protection Act 2018.

### 1. Purpose & Use of Data

#### 1.1 Service Provision

In providing our services, we may collect and/or process "personal data" and/or "special category data" as defined in the UK data protection legislation.

All processing is conducted for the provision of **contracted services**.

This may be our company data, data associated with our consultants and/or processing data on behalf of our clients.

We respect the security of this data at all times and all processing is conducted in accordance with the legislation and our compliance measures.

We operate a risk-based Information Security Management System to minimise threats to personal and other information.

Read more about our Information Security Measures:

<https://www.assentriskmanagement.co.uk/information-security-at-assent/>

The personal data we may process includes:

- Staff Information,
- Consultant Information,
- Client contact details,
- Prospective clients' contact details
- Contact Details,
- Training Records

We retain data as long as it remains pertinent to the contract and/or if the time-period is prescribed by Statute. All destruction is by secure means. Please see our data storage and retention policy.

We may share details with third parties in the provision of our contracted services and/or if we are required to do so by UK law. All feasible security measures are in place. We cannot accept any liability for processing by any third party outside our remit.

Please refer to your contract for full details.

## 1.2 Cookies

In accordance with legislation we have completed a cookie audit on our websites.

We use these internet files with Google Analytics to monitor and improve our website.

Cookies are also utilised by the social media sites we connect to, but we cannot accept any responsibility for any processing by these sites.

On some websites we also show advertising which is served by a third party.

## 1.3 Mailing Lists

We use a double opt-in subscription process for all our public mailing lists. You can unsubscribe at any time.

If you are a client or perspective client where we have a legitimate business interest, we may add you to our other mailing lists. You can unsubscribe at any time.

We do not buy mailing lists or use the personal data of subjects we have not previously communicated with.

All mailing lists are managed within a third-party tool, MailChimp.  
<https://mailchimp.com/legal/privacy/>.

## 2. Data Minimalization

We will only collect the level of data required to effectively execute the purposes as in 1 above.

## 3. Accuracy

In carrying out the services detailed in 1 above, we will be diligent in collecting accurate data, however it is your right to have your data corrected if it is inaccurate. Please use the contact details below to make this request.

## 4. Storage Limitation

We store the data we collect securely and in line with our storage and retention policy.

## 5. Integrity and Confidentiality.

We operate an Information Security Management System to manage risks to our information assets including any Cloud based systems or services we use. We implement security controls to reduce the threats to data in the cloud. If you have special or contractual requirements, please contact us for more information.

Read more about our Information Security Measures:  
<https://www.assentriskmanagement.co.uk/information-security-at-assent/>

## **Your Rights**

### **Transparency and Modalities -**

We'll tell you how we use your data and inform you if that changes.

### **Information and Access to Personal Data -**

You may request a copy of the personal information we may hold on you – this should be submitted in writing or email.

Please include enough information to enable us to identify you and search for appropriate data.

We'll tell you what data we have and give you access to it on request.  
(See 'Contacting Us' Below).

### **Rectification and Erasure -**

We'll update your information on our records, and any published information, if it changes, just let us know, (See 'Contacting Us' Below).

We will delete your personal data on request unless there is legal or justifiable reason to keep it.

We will not erase:

- Invoices and financial data relating to the contract.
- Data relating to an ongoing legal proceeding.
- Data relating to work where payment has not been settled.
- Repression data, for example the fact that you have told us NOT to contact you.

We will complete the data erasure process within a reasonable time.

We will delete your business information from our systems including:

- CRM,
- File Storage,
- Project Management,
- Ticket System, [by means of redaction]
- Emails,
- Other Systems as contained within our Internal System Security List [Internal Confidential].

Information that is not easily accessible, for example that held within a backup or email archive, will be retained for the duration of the retention policy specific for that system.

See our Data Storage and Retention Policy for more information.

### **Restrictions of Processing -**

We will process your data in line with this policy and the agreed contract.

### **Data Portability -**

If you need to, and with your permission, we'll help you move your information to another provider.

**Right to object -**

You may object to any of the purposes as described within this policy, (See 'Contacting Us' Below).

**Automated individual decision-making -**

We don't use automated individual decision-making, other than as described in this policy.

**Data Breaches**

If a data breach does occur, we will respond as quickly as possible using our incident management procedure to minimise the impact and rectify where possible.

If the breach is likely to result in a high risk to your rights and freedoms, we will inform you in writing within 72 hours of having become aware of the breach.

We will keep you updated on the steps we are taking to resolve the breach.

**Data Protection Contacts**

Assent is not a public body, engage in regular or systematic monitoring of data subjects or processors of a large scale of special category data.

Therefore, we have not designated a Data Protection Officer (DPO). However, we have assigned responsibility for data protection at board level. All enquiries should be raised to our office using the Contact Us details below.

**Complaints**

If you are dissatisfied with this policy, have queries about our data protection procedures or wish to lodge a complaint, please contact the company in the first instance: <https://assentuk.freshdesk.com/support/tickets/new>

Thereafter you have the right to submit a complaint to the Supervisory Authority, the Information Commissioner's Office (ICO):

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

**Contacting Us**

If you have any questions about this policy, or would like to make a request regarding your personal data, please contact us:

<https://assentuk.freshdesk.com/support/tickets/new>