

## Privacy Policy (Clients, Platform Users & Business Contacts)



### 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.

## 1. Who We Are

**Associate Enterprises Limited** (“we”, “us”, “our”) provides consultancy, audit services, online platforms (including LMS services) and other professional services.

We are the **data controller** for the personal data described in this Privacy Policy.

### Contact details

Email: [desk@assent1.com](mailto:desk@assent1.com)

Address Details see <https://www.clemarkgroup.com/about/>

## 2. Scope of This Policy

This policy applies to:

- Clients and their personnel
- Prospective clients and business contacts
- Users of our eLearning/LMS platforms
- Individuals interacting with our website or services

## 3. The Personal Data We Collect

We process the following categories of personal data:

### 3.1 Client & Business Contact Data

- Name
- Job title
- Work email address
- Telephone number
- Employer / business details

### 3.2 Consultancy & Audit Engagement Data

- Client employee names and contact details
- Customer, supplier, or organisational data provided during engagements
- Documents and records created or shared as part of services

### 3.3 Customer Service & Contract Data

- Contact details
- Communications with support teams
- Contractual and engagement documentation

### 3.4 Marketing & CRM Data

- Contact details
- Purchase history
- Marketing preferences

### 3.5 Website & Analytics Data

- IP address
- Approximate location
- Technical usage data (e.g. cookies, interactions)

### 3.6 LMS / eLearning Platform Data

- Name and contact details
- Account login details
- Training activity and completion records
- Platform usage data

## 4. How We Use Your Personal Data

We use personal data for the following purposes:

Purpose	Description	Lawful Basis
Deliver services	Providing consultancy, audit, and contractual services	Article 6(1)(b) – Contract
Manage client relationships	Communication, support, and account management	Article 6(1)(b) – Contract
Customer support	Handling enquiries via helpdesk systems	Article 6(1)(b) or (a)
Marketing	Sending updates, newsletters, and relevant services	Article 6(1)(a) – Consent
Business development	Managing contacts from networking or events	Article 6(1)(a) – Consent
LMS provision	Delivering training and managing user accounts	Article 6(1)(a) – Consent
Website analytics	Improving website and services	Article 6(1)(a) – Consent
Legal compliance	Financial records, tax obligations	Article 6(1)(c) – Legal obligation

## 5. Special Category Data

We generally do **not process special category data** for clients or platform users.

Where such data is processed (e.g. within client-provided materials), this is:

- Controlled by the client, and
- Processed under contractual obligations and appropriate safeguards

## 6. Where We Get Personal Data From

We collect personal data from:

- You directly (e.g. via forms, contracts, or platform sign-up)
- Your organisation (our client)
- Public sources (e.g. networking events, business exchanges)
- Website interactions

## 7. Sharing Your Personal Data

We may share personal data with:

### 7.1 Group Companies and Affiliates

We may share personal data within our corporate group, including:

- Parent companies
- Subsidiaries
- Affiliated or related companies

This is for purposes such as:

- Delivering our services
- Internal administration
- Business operations and reporting

All group companies are required to:

- Process personal data in accordance with this Privacy Policy
- Apply appropriate security and confidentiality controls

### 7.2 Subcontractors and Consultants

We may engage **subcontractors or independent consultants** to support the delivery of our consultancy, audit, and training services.

Where this occurs:

- Subcontractors are given access only to the personal data necessary to perform their role

- They are contractually bound by **confidentiality and data protection obligations**
- They must process personal data **only in accordance with our instructions**

### 7.3 Service Providers (Processors)

- CRM systems
- Cloud platforms (e.g. Microsoft 365, Google Workspace)
- Helpdesk providers (e.g. Freshdesk, call/email handling services)
- Accounting software (e.g. Xero)
- LMS platform providers

### 7.4 Authorities

- HMRC or regulators where required by law

### 7.5 Clients (in service delivery)

Where necessary for consultancy/audit services

All processors are subject to contractual obligations and appropriate safeguards

## 8. International Transfers

Your data may be processed using cloud services that operate outside the UK.

Where this occurs, we ensure safeguards such as:

- UK adequacy regulations
- Standard contractual clauses
- Equivalent protections required under UK GDPR

## 9. Data Retention

We retain personal data in line with our Retention Policy:

Data Type	Retention Period
Client records & contracts	Up to 7 years after relationship ends
Consultancy/audit data	4 years after engagement ends
Customer service records	Up to 7 years

Data Type	Retention Period
Marketing data	Until consent withdrawn or relationship ends
Website analytics	Up to 1 year
LMS user data	Up to 7 years

Data is securely deleted or anonymised when no longer required.

## 10. Security Measures

We implement appropriate **technical and organisational measures** including:

- Encryption of data in transit and at rest
- Access controls (role-based permissions)
- Secure cloud storage
- Regular monitoring and controls

## 11. Your Rights

Under UK GDPR, you have the right to:

- Access your personal data
- Correct inaccurate data
- Request erasure
- Restrict processing
- Object to processing
- Data portability
- Withdraw consent (where applicable)

To exercise your rights, contact us using the details above.

## 12. Direct Marketing

We send marketing communications only where:

- You have given consent, or
- It is otherwise permitted under UK law

You can unsubscribe at any time via:

- Email links
- Direct request to us

## 13. Automated Decision-Making

We do **not** carry out automated decision-making or profiling that produces legal or significant effects.

## 14. Cookies and Website Tracking

We use cookies and similar technologies for:

- Website functionality
- Analytics

Where required, we obtain your consent before placing non-essential cookies.

## 15. Complaints

If you are unhappy with how we handle your data, you can contact us first:

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

We will acknowledge your complaint within 30 days and investigate without delay. We will provide a response to your complaint and communicate the outcome.

If you are not satisfied with our response, you have the right to submit a complaint to the Information Commissioner's Office (ICO):

Website: <https://www.ico.org.uk>

Telephone: +44303 123 1113

## 16. Updates to This Policy

We may update this Privacy Policy from time to time. The latest version will always be available on our website.

## 17. Our Role: Data Controller vs Data Processor

Depending on the service we provide, we may act as either a **data controller** or a **data processor** under UK GDPR.

### 17.1 When We Act as a Data Controller

We act as a **data controller** where we determine the purposes and means of processing personal data.

This includes:

- Managing our **client relationships and contracts**
- Handling **customer service enquiries and communications**
- Operating our **CRM and marketing activities**
- Managing **business contacts and networking data**
- Running our **website and analytics**
- Operating our **LMS/eLearning platforms where users register directly with us**

In these cases:

- We decide how and why personal data is processed
- We are responsible for complying with UK GDPR principles
- This Privacy Policy applies fully

**Typical lawful bases used:**

- Contract (Article 6(1)(b))
- Legal obligation (Article 6(1)(c))
- Consent (Article 6(1)(a))

## 17.2 When We Act as a Data Processor

We act as a **data processor** where we process personal data **on behalf of our clients**, who are the data controllers.

This primarily applies to:

- **Consultancy and internal audit services**
- **ISO advisory engagements**
- Handling **client-provided documents, systems, or records**
- Accessing personal data within client environments during service delivery

In these situations:

- The **client remains the data controller**
- We process data **only in accordance with client instructions**
- We do not determine the purpose of processing

## 17.3 Processor Obligations

Where we act as a processor, we:

- Enter into **Data Processing Agreements (DPAs)** with clients
- Process data **only on documented instructions**
- Ensure **confidentiality obligations** are in place
- Implement appropriate **technical and organisational measures** (e.g. encryption, access controls)
- Assist clients in fulfilling:

- o Data subject rights
- o Breach notification obligations
- o Data protection impact assessments (where required)

## 17.4 Client Responsibilities (Where We Are Processor)

Where we act as a processor, our clients (as controllers) are responsible for:

- Identifying a **lawful basis for processing**
- Providing appropriate **privacy information** to individuals
- Managing **data subject rights requests**
- Determining **retention periods**
- Ensuring data shared with us is **necessary and proportionate**

## 17.5 LMS / Platform-Specific Roles

For your **eLearning and SaaS platforms (e.g. LMS services)**, roles may vary:

### a) Direct Users (Self-Registration)

Where individuals sign up themselves:

- We act as **data controller**
- This Privacy Policy applies

### b) Client-Managed Platforms

Where a client provides user data (e.g. employee training):

- The client is **controller**
- We act as **processor**

## 17.6 Transparency and Clarity

If you are unsure whether we are acting as a controller or processor in a specific context, you may contact us using the details above.