

CHURCHILL CORPORATE SOLUTIONS LLP TRADING AS POPPLETON & APPLEBY

This privacy policy is in two parts and is dated: May 2018

Part 1: Deals with the European Union's General Data Protection Regulations (GDPR), and its requirements regarding the collection and use of your personal data by Churchill Corporation Solutions LLP t/a Poppleton & Appleby ('The Firm'). This is set out in more detail below.

Part 2: This part sets out the practices 'The Firm' follows in order to respect the privacy of all visitors to this website relating to the information we collect from this website and other means of communication including email, telephone/fax, meetings and mail.

Part 1 GDPR

Poppleton & Appleby is the trading name of Churchill Corporate Solutions LLP, a Limited Liability Partnership.

Churchill Corporate Solutions LLP t/a Poppleton & Appleby is the registered Data Controller.

Registered Office: St Crispin House, St Crispin Way, Haslingden, Lancashire, BB4 4PW

Trading Addresses: 16 Oxford Court, Bishopsgate, Manchester, M2 3WQ, tel: (0161) 228 3028

The Media Centre, 7 Northumberland Street, Huddersfield, HD1 1RL, tel: (01484) 437 432

Our Data Protection Officer/Head of Privacy can be contacted at: info@pandanorthern.co.uk

What are your rights?

This Privacy Statement applies to Churchill Corporate Solutions LLP trading as Poppleton & Appleby. If, as a visitor to this website you choose to submit information, you agree to the use of such data in accordance with the terms set out in this privacy statement.

If at any point you believe the information we process on you is incorrect, you can request to see this information and have it corrected or deleted, if you so wish. If you wish to raise a complaint on how we have handled your personal data, you can contact our Data Protection Office/Head of Privacy, using the email address above, who will investigate the matter.

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the requirements of GDPR, then you are within your rights to lodge a complaint with the Information Commissioner's Office (ICO).

Unless otherwise agreed with you, we will only collect basic personal data about you, which does not include any 'sensitive personal data'. This basic personal information will include: your name, work address, email address and job title.

The full list of your rights under GDPR is shown below:

1. The right to access the personal data we hold on you.
2. The right to correct and update the personal data we hold on you.
3. The right to have your personal data deleted where there is no good reason for us to continue to hold or process it.
4. The right to object to processing of your personal data.
5. The right to data portability.
6. The right to withdraw your consent to the processing at any time for any processing of personal data to which consent was sought.

7. The right to lodge a complaint with the Information Commissioner's Office. You can email them via: <https://ico.org.uk/global/contact-us/email/>, call them on 0303 123 1113, or write to them at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Data Collection

We need to know basic personal data, including: your name, work address, email address and job title, in order to provide you with our services, and to claim our right to be paid in return for our services, under our standard terms of business if we are contracted to work for you or your company. If you do not provide this information then we will be unable to provide the services you have requested. We will not collect any personal data from you that we do not need in order to provide and oversee the services we have agreed to provide you with.

Use of Data

All the personal data we hold about you will be processed by our staff. No third parties will have access to your personal data unless there is a legal obligation for us to provide them with this. We have set out below the legal bases for the Firm to process your data.

We may also process your personal data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with providing you with services.

We will also communicate with you information about other services we can offer you and update you about our activities.

Where your information is used other than in accordance with one of these uses, we will first obtain your consent to that use. We take all reasonable steps to ensure that your personal data is processed securely.

Sharing your personal data

Your personal data will only be shared with third parties including other data controllers where it is necessary for the performance of the data controllers' tasks or where you first give us your prior consent. It is likely that we will need to share your data with:

- members of staff in the Firm other than our head of data privacy;
- Our agents, suppliers and contractors. For example, we may ask a supplier to send out newsletters on our behalf, or to maintain our database software, or to provide us with administration, IT and other related services;

Any personal data transferred to countries or territories outside the European Union will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union.

Part 2 – Our Privacy Practices

The Firm uses fair information and data practices that are designed for the protection of your privacy. Should you consider that your concerns have not been addressed in this statement or have any other questions, please feel free to contact us by email at info@pandanorthern.co.uk

Information Collection

As a visitor to this website, you do not have to submit any personal information in order to use the website. The site stores personally identifiable information that is specifically voluntarily provided by visitors. Basic information received includes name, title, address, email address, telephone number. Any further information including email attachments is disclosed voluntarily and only with your knowledge.

In addition, you may wish to supply personal information by telephone and by other delivery means, for example, post, personal delivery or in a meeting. We will collect, use, share and store this personal data. Where personal and financial information relating to a connected or unconnected third party is supplied by you, you confirm that you have their consent and entitled to provide the information for our use.

Typically, this data is collected in order to assist visitors to:

- receive information about the Firm and the services we offer
- submit CVs or work history information
- contact us for further information

It is The Firm's policy to limit the information collected to only the minimum information required to complete a Site visitor's request.

If you contact us with specific requests to be contacted for additional reasons, for example, marketing or social media, we may also use, share and store any such information voluntarily provided.

It is the Firm's intention to not seek any sensitive information through our website, unless legally required for specific purposes. Sensitive information is defined as including data relating to race or ethnic origin, political opinions, religious or other similar beliefs, trade union membership, physical or mental health, sexual orientation, or criminal record.

Use of Cookies

This site uses cookies – small text files that are placed on your machine to help the site provide a better user experience. In general, cookies are used to retain user preferences, store information for things like shopping carts, and provide anonymised tracing data to third party applications like Google Analytics. As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser or taking a look at [the About Cookies website](#) which offers guidance for all modern browser.

Use of Data

User Data obtained by this website or other means is used for the Firm's internal business purposes and in connection with a visitor's request and only when permitted by law. This data is not shared with others for unrelated purposes unless stated in this Privacy Policy or otherwise communicated to the visitor to the website.

The Firm makes every practical effort to avoid excessive or irrelevant collection of data. If a visitor believes the website has collected excessive information, please contact us.

The legal bases upon which we rely to process personal data are:

- where you have given your informed specific and unambiguous consent;
- where we are required to comply with a statutory obligation;
- where we need to perform a contract that we have entered into with you;
- where it is necessary to use your personal information to pursue our legitimate interests or those of a third party;

For the avoidance of doubt, these include the following:

- to comply with our legal obligations to detect and prevent fraud, money laundering, terrorism and other crimes;
- to carry out regulatory checks and meet our obligations to any regulatory authority;
- to assist us in providing our services to you;
- periodic issue of promotional emails about our services or other information which we think you may find of interest ensuring that any marketing activities comply with applicable law.

Except for instances where visitors explicitly choose to receive specific Poppleton & Appleby marketing or other informational materials, the Firm will not use personal data collected from our Website to distribute marketing or informational materials.

Third Parties

It is the Firm's policy only to disclose User Data to third parties under the following circumstances:

- when explicitly requested by the visitor
- when required to deliver publications or reference materials requested by the visitor
- when required to facilitate conferences or events hosted by a third party
- when required to meet any other request of a visitor.

Categories of third parties that the Firm may share personally identifiable information with include National, Regional and local government entities, law enforcement agencies or, where necessary, to comply with legal or regulatory obligations.

Where legislation requires us to carry out an identification check we will validate your name, address and other information supplied by you with an appropriate third party database. You should advise if you do not consent to such a check being made. These checks may require personal information provided by you to be disclosed to a registered credit reference agency which may keep a record of that information. The checks are only to confirm your identity. A credit check will not be performed and your credit rating will not be affected.

This site does not collect or compile personally identifying information for the dissemination of or sale to outside parties for consumer marketing purposes, or host mailings on behalf of third parties.

Retention of Data

Your personal information will only be retained for as long as necessary to fulfil the purpose for which it is collected in line with the statutory and professional rules of retention. Generally, the period for retaining personal data will be 6 years from the date of closure of contact which you may have with the Firm. It may be that personal information is required to be held for a reduced period of time in which case, it will be in accordance with our retention policies in place, from time to time.

Examples of retention periods are as follows:

- engagement matters – information required by law when the Firm is engaged to act in a formal capacity is required to be held for a period of 6 years from the date when the matter has been formally closed or is ended;
- marketing information – the retention period will be the period of our business relationship with you and a period of 6 years thereafter unless otherwise requested by you under this policy;
- social media – the period during which we are connected with you on any given social media platform.

Transfer of User Data outside the User Jurisdiction

The Internet is a global environment. In order to provide a site that works well, we may need to transfer User Data to locations outside the jurisdiction in which a visitor is viewing the site (the User Jurisdiction) and process User Data outside the User Jurisdiction. If the User Jurisdiction is within the European Economic Area (the EEA) please note that such transfers and processing of personal data may be in locations outside the EEA. Any data sent or uploaded by users may be accessible in jurisdictions outside the User Jurisdiction (including outside the EEA). The level of data protection offered in such jurisdictions may be less than that offered within the User Jurisdiction or (as the case may be) within the EEA.

Third-party Links

There are several places throughout this site that may link to other websites that do not operate under Poppleton & Appleby's privacy practices. When visitors link to other websites, Poppleton & Appleby's privacy practices no longer apply. We encourage visitors to review each site's privacy policy before disclosing any personally identifiable information.

Choices

As a policy, visitors are not required to register to gain access to this site. Personally identifiable information provided to Poppleton & Appleby through this site is provided voluntarily by visitors. Should visitors subsequently choose to unsubscribe from mailing lists or any registrations, please contact info@pandanorthern.co.uk

Access

Each visitor has the right of access to personal data they have submitted through this site. Enquiries about the accuracy of identifying information previously submitted, or requests to have information removed, should be directed to info@pandanorthern.co.uk

Security

All members of staff of Poppleton & Appleby are instructed to follow a firm-wide security policy. Only authorised personnel are provided access to personally-identifiable information and these employees are required to agree to ensure confidentiality of this information.

Modifications

Poppleton & Appleby reserves the right to modify or amend this statement at any time. The effective date will be displayed at the beginning of this statement. Nothing contained within this policy creates or is intended to create a contract or agreement between Churchill Corporation Solutions LLP and any user visiting the website or providing identifying information of any kind.

Consent

By continuing to use the site and by providing any personal data (including sensitive personal data) to us via the site or email addresses provided on the site, visitors are consenting to our use of your personal data as set out in this Privacy Policy. Please do not send us any personal data if you do not want that information to be used by us in this manner.