

PRIVACY NOTICE (POLICY)

This is a Privacy Notice of **Fox's Burton's Companies (FBC) UK Limited**.

This Privacy Notice informs you who we are, how we collect, use, secure and share personal information collected by us when you visit our website(s), enquire about or buy goods/products/services from us, send to, or receive from us, communications, register or attend our events or webinars, visit our offices or media pages and through any other Interactions we have with you. This Privacy Notice also informs you how you can exercise your rights.

This notice does **not** describe our processing of personal data relating to people who apply for jobs with us. Neither does this notice describe our processing of personal data relating to our employees.

Fox's Burton's Companies (FBC) UK Limited ('FBC', 'we', 'us', and 'our') is committed to respecting and protecting the privacy of individuals and to fully complying with all the requirements of the UK GDPR and all other applicable data protection laws and regulations.

If you have any questions or concerns about our use of your personal information, please contact us using the contact details provided elsewhere in this Privacy Notice.

Data Protection Officer

We have appointed a Data Protection Officer (DPO). If you wish to contact our DPO you can do so via: dpo@fbc-uk.com.

This Privacy Notice applies to all our data subjects (an individual about whom we hold personal information) except Job Applicants / Candidate and our employees.

What is personal information?

Personal information is anything that enables you to be identified or identifiable. Personal information is also called "personal data". We collectively refer to handling, collecting, protecting, storing or otherwise using your personal information as 'processing'.

If you fail to provide personal information

Where we need to collect personal information by law, or under the terms of a contract we have with you and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you or provide you with goods or services you have requested.

Collecting (obtaining) your Personal Information

Most of the personal information we process is provided to us directly by you, for example for one or more of the following reasons:

- You have made an enquiry or information request to us.
- You have ordered products, goods or services from us.
- You have requested to attend or have attended our events.

- You have subscribed to our e-newsletter(s).
- You have visited our website(s) or used app(s) or platform
- You have provided a business cards or other contact information.
- You have participated in our competitions or prize draws.
- You visit our premises.

We may also obtain your personal information indirectly, such as from:

- Public registers/records
- Websites.
- Social media.
- Lead generation providers
- Data brokers
- Using CCTV or other monitoring devices.
- When your contact details are given to us as a referee or for use in an emergency.
- Communications using our Consumer Careline.

Images

On occasions, at our offices/work premises and 3 party-locations, photos and/or videos may be taken of you, either alone or as part of a group, and used by us, including by being placed on social media. If you have any objection to a photo of you being taken, or an image of you otherwise 'captured', please make this known to your line manager or by sending an email to dpo@fbc-uk.com.

The personal information we collect about you

We may collect and otherwise process different kinds of personal data about you which we have grouped together as follows:

- **Contact Data** includes postal and email address and telephone numbers.
- **Identity Data** includes names and similar identifiers, marital status, title, date of birth and gender.
- **Financial Data** includes bank account and payment card details.
- **Communications Data** includes your communication preferences.
- **Transaction Data** includes details about payments to and from you and other details of products, goods and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website and services.
- **Usage Data** includes information about how you use our products, services and website.

Lawful Bases (legal grounds) for Processing Personal Information

Our legal basis for collecting and using your personal information will depend on the personal information concerned and the specific context in which we collect it.

We will normally collect personal data from you on one or more of the following lawful bases:

- **Consent:** We may process your personal information after you have consented (agreed) to us doing so. Your consent may have been obtained by us, or by third parties on our behalf. You have the right to withdraw your consent at any time.
- **Contract:** We may process your personal information when we need to deliver a contractual service to you or because you have asked us to do something before entering into a contract (e.g., provide a quote).
- **Legal obligation:** We may process your personal information when we need to comply with a legal obligation.
- **Legitimate interest:** We may process your personal information when we need to for our or another's legitimate interests, where these interests are not overridden by your rights.

Purpose(s) for Processing Personal Information

We have set out below a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Please note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground(s) we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data (see 'The personal information we collect about you' above)	Lawful basis for processing
To register a new client/customer	<ul style="list-style-type: none"> • Contact • Identity 	<ul style="list-style-type: none"> • Contract
To process and deliver an order or request	<ul style="list-style-type: none"> • Contact • Identity • Financial • Transaction • Communications 	<ul style="list-style-type: none"> • Contract • Legitimate interest (to recover debts due to us and to protect our business and your account from fraud and other illegal activities)
To manage our customer and business relationships	<ul style="list-style-type: none"> • Contact • Identity • Communications 	<ul style="list-style-type: none"> • Contract • Legal obligation • Legitimate interest (to keep our records)

		updated and to study how customers and business contacts and partners use our products/goods/services)
To marketing our products	<ul style="list-style-type: none"> • Contact • Identity • Usage • Communications 	<ul style="list-style-type: none"> • Consent • Legitimate interest (to provide customers and contacts with information about our products/goods/services)
To promote prize draws and competitions.	<ul style="list-style-type: none"> • Contact • Identity • Communications • 	<ul style="list-style-type: none"> • Contract • Consent
To administer and manage our website	<ul style="list-style-type: none"> • Contact • Identity • Technical 	<ul style="list-style-type: none"> • Legitimate interest (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)
To ensure you are able to attend an event.	<ul style="list-style-type: none"> • Contact • Identity • Communications 	<ul style="list-style-type: none"> • Consent • Contract • Legitimate interest (to promote and develop our products/goods/services and grow our business)
To develop our businesses and services	<ul style="list-style-type: none"> • Contact • Identity • Financial • Communications • Transaction • Technical • Usage 	<ul style="list-style-type: none"> • Legitimate interests (to develop our products/goods/services and grow our business)

For the safety and security of our staff, visitors and others.	<ul style="list-style-type: none"> • Contact • Identity 	<ul style="list-style-type: none"> • Legitimate interests (to protect and keep safe develop our staff, visitors and other individuals that we have a responsibility for)
To comply with our legal obligations	<ul style="list-style-type: none"> • Contact • Identity • Financial • Communications • Transaction • Technical • Usage 	<ul style="list-style-type: none"> • Legal obligation

Using your Personal Information for Marketing Purposes

We do not collect or otherwise process personal information for marketing purposes.

Sharing your Personal Information

We may share your personal information with third parties (other organisations or individuals) for:

- The purpose(s) for which the information was submitted.
- The purposes listed under '**Using your personal information**'.
- As agreed between us.

We share personal information with third parties that act as data processors to provide elements of our service by processing personal information on our instructions (see '**Data Processors**' below).

We may share your personal information with third parties in connection with our corporate transactions, (e.g., mergers and/or acquisitions), as a result of which your personal information may be assigned to a third party.

We may share your personal information with law enforcement, regulatory and other government agencies and professional bodies, as required by and/or in accordance with applicable law or regulation.

In some circumstances we are legally obliged to share information. For example, under a court order.

It is our policy to only share your personal information with third parties that are legally or contractually bound to protect your personal information to the same standards as we are, and that will flow those same standards to their subcontractors.

In any scenario, we'll satisfy ourselves that we have a lawful basis on which to share your personal information.

We will not sell your personal information to any third party.

Data processors

Where we use data processors, we have contracts in place with them to ensure that they cannot do anything with personal information we have shared with them unless we have instructed them to do it. They will hold it securely and retain it for the period we instruct them to.

These data processors may use sub-contractors (known as sub-processors) that have access to your personal data. If they do, they are required to have contracts in place with those sub-processors to ensure that they cannot do anything with personal information shared with them beyond what we have instructed our data processors to do with it.

The data processors which we **mainly and routinely** use* are:

- We use **SAP Concur** based in Italy to provide business expense management. Here is a link to its Privacy Notice: [Privacy Statement - SAP Concur UK](#).
- We use **SAP** based in Italy to provide Enterprise Resource Planning Solutions & Human Capital Management solutions. Here is a link to its Privacy Notice: [Data Protection and Privacy | SAP Trust Center](#).
- We use **ADP UK** based in the UK to provide payroll services. Here is a link to its Privacy Notice: [Privacy | ADP UK](#).
- We use **UKG** based in Italy to provide workforce management solution. Here is a link to its Privacy Notice: [Privacy Notice](#).
- We use **NTT Data Solutions** based in the UK to provide ERP support. Here is a link to its Privacy Notice: [Legal, Security and Trust \(nttdata-solutions.com\)](#).
- We use **Microsoft** based in Italy to provide personal productivity solutions, reporting, data storage and processing. Here is a link to its Privacy Notice: [Microsoft Privacy Statement – Microsoft privacy](#)
- We use **Oracle** based in the UK to provide reporting solutions. Here is a link to its Privacy Notice: [Oracle Privacy Policy | Oracle United Kingdom](#).
- We use **Great Place to Work** based in the USA to provide employee surveys. Here is a link to its Privacy Notice: [Privacy Policy | Great Place To Work® UK](#)
- We use **Accenture Management Support** based in The Philippines, India and elsewhere for IT support. Its Privacy Notice is available from us on request.
- We use **Pixel Fridge** as our website developers. Here is a link to its Privacy Notice: [Privacy & Data Protection](#).
- We use **Parade** based in the UK to provide customer care engagement Here is a link to its Privacy Notice: [Privacy Policy](#).

*The above list identifies those data processors that we routinely use. It does not identify each and every data processor we use.

Transfers of your personal information to outside the UK

Your personal information may be transferred (sent to or accessed from) outside the UK. Any such transfer will be only:

- To you; or

- To a recipient located in a country which provides an adequate level of protection for your personal information, (i.e., a country where the data protection standards are the same or better than in the UK), for example, a country in the European Union (EU), or European Economic Area (EEA); or
- To a recipient under a contractual agreement which satisfies UK legal requirements for the transfer of personal information, to ensure that appropriate safeguards are in place to protect your personal information in accordance with UK levels of data protection; or
- To a recipient under the UK-US Data Bridge; or
- When your personal information has first been anonymised

The countries/areas to which we may **sometimes** transfer personal data to* are:

EU/EEA: To a recipient located in a country which provides an adequate level of protection for your personal information.

USA: To a recipient certified under the UK- US Data Bridge, which provides an adequate level of protection for your personal information; or to a recipient not certified under the UK- US Data Bridge, in which case the transfer is made using an International Data Transfer Agreement or UK Addendum to EU Standard Contractual Clauses

India: To a recipient using an International Data Transfer Agreement or UK Addendum to EU Standard Contractual Clauses

*This does not mean that your personal data will definitely be transferred to any of these countries.

Retention (Storage) of Personal Information

We will retain your personal information only for as long as we need it for the purpose(s) for which it was collected, or as required to do so by law.

To determine the appropriate retention period for your personal information, we consider the amount, nature, and sensitivity of it, the potential risk of harm from unauthorised use or disclosure of it, the purposes for which we process it and whether we can achieve those purposes through other means, as well as applicable legal requirements.

Examples of the periods for which personal information will be stored*

Personal data	Retention period
Customer records	As required by any applicable statutory retention period, or where no statutory retention period applies, five years after contractual relationship ends, or five years from our last date of contact, whichever is the latest.
Business contacts records	As required by any applicable statutory retention period, or where no statutory retention period applies, three years after business relationship ends.

Participants in prize draw competitions.	18 months from when the competition closes.
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*The above list, which gives examples and does not identify each and every, period for which individuals' personal data will be stored. Further information about our retention of Personal Information is set out in our Retention Policy. If you would like a copy of our Retention Policy, please contact us.

Your data protection rights

Under data protection law, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

- **Your right of access:** You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process. [You can read more about this right here.](#)
- **Your right to rectification:** You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies. [You can read more about this right here.](#)
- **Your right to erasure:** You have the right to ask us to erase your personal information in certain circumstances. [You can read more about this right here.](#)
- **Your right to restriction of processing:** You have the right to ask us to restrict the processing of your information in certain circumstances. [You can read more about this right here.](#)
- **Your right to object to processing:** You have the right to object to processing if we are able to process your information because the process forms part of our public tasks or is in our legitimate interests. [You can read more about this right here.](#)
- **Your right to data portability:** This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another or give it to you. The right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated. [You can read more about this right here.](#)

You are not required to pay any charge for exercising your rights. We have one month to respond to you.

If you wish to exercise any of your rights, please contact us.

Security

We use appropriate technical and organisational measures to protect the personal data that we collect and process about you. The measures we use are designed to provide a level of

security appropriate to the risk of processing your personal data. Please be aware that, we cannot guarantee the security of all personal information transmitted to or by us.

Artificial Intelligence (AI)

We use Artificial Intelligence (AI), which means that AI may be used to process your personal data.

When we use AI, we do so in compliance with applicable data protection legislation, and regulatory guidance. The AI tools, which we use to provide efficiency to our business operations, are:

1. ChatGPT
2. Microsoft Co-Pilot

Automated Decision Making

We will not use your personal information for automated decision making or profiling

Children's personal information

We do not provide services directly to children or proactively collect their personal information.

Visiting our premises

When you visit our premises you may provide your name and other personal information for security and safety reasons. Your image may also be captured by our use of CCTV (see below).

CCTV

Closed-circuit television (CCTV) operates at our premises for security and safety reasons. The lawful basis we rely on to process personal data collected via our use of CCTV is article 6(1)(f) of the UK GDPR, which allows us to process personal data when its necessary for the purposes of our legitimate interests.

Wi Fi

We provide Wi-Fi on site for the use of visitors. We'll provide you with the address and password. We record the device address and will automatically allocate you an IP address whilst on site. We also log traffic information in the form of sites visited duration and date sent/received. The purpose for processing this information is to provide you with access to the internet whilst visiting our site. The lawful basis we rely on to process your personal data is article 6(1)(f) of the UK GDPR, which allows us to process personal data when its necessary for the purposes of our legitimate interests.

Attending an event of ours

If you wish to attend one of our events, you will be asked to provide your contact information including your organisation's name and, if offered a place, information about any dietary requirements or access provisions you may need. We may also ask for payment if there is a charge to attend.

We use this information to facilitate the event and provide you with an acceptable service. We also need this information so we can respond to you.

Our purpose for collecting this information is so we can facilitate the event and provide you with an acceptable service. The lawful basis we rely on for processing your personal data is your consent under article 6(1)(a) of the UK GDPR. When we collect any information about dietary or access requirements, we also need your consent (under article 9(2)(a)) as this type of information is classed as special category data.

Links to other websites

Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

Our contact details

We can be contacted as follows:

- Email: dpo@fbc-uk.com.
- Post: Charter Court, 74-78 Victoria Street, St Albans. Herts. AL1 3XH.

Updating

We may update this Privacy notice at any time by publishing an updated version here. So that you know when we make changes, we will amend the revision date at the bottom of this page. The new modified or amended privacy policy will apply from that revision date.

This Privacy Notice was last updated on **25 July 2024**.