# Appco UK Ltd Privacy Notice



Here at Appco UK, we understand the importance of protecting the personal information that we obtain during the course of our business activity, and we also know how important it is to you.

We will only collect and use personal information in the ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

In respect of personal data processed on behalf of one of our clients, the client's privacy policy, rather than this Privacy Notice, will apply to our processing of your information.

#### **INFORMATION ABOUT US**

Appco UK Ltd is a limited company registered in England under number 3464199. Our registered office is Studio 320B, Highgate Studios, 53-79 Highgate Road, London, NW5 1TL. ("We, us, our").

## WHAT DOES THIS NOTICE COVER?

This Privacy Notice applies to the following:

- People who visit our website
- People who contact us
- People whose services we use or who we provide services to
- People who make a complaint
- Job applicants

#### Visitors to our websites

When you visit our website, tracking technologies such as 'cookies' may automatically record information about your visit. We only use these cookies to help us improve our website and do not make any attempt to identify anyone. Please see our Cookies Policy for more information.

Our website may contain links to third-party websites. If you follow these links, please be aware that we take no responsibility for any third-party website. Please check any privacy policy on those websites before submitting any personal information.

#### People who contact us

When you contact us, we will use your contact details, such as name and/or email address to be able to respond and engage with you.

#### People whose services we use or who we provide services to

Where we engage individuals or organisations to carry out services for us, or where we provide services to our clients, we may be required to process personal information of the service provider or client personnel in order to facilitate the provision of the service. We may also collect and retain information to enable us to evaluate that service.

Any such processing will be governed by contractual terms between us and the service provider or client, but the general provisions as to data security and retention periods etc. are as set out in this Privacy Notice.

#### **Complaint management**

When a person contacts us in relation to a complaint, we generally need to capture the details of the person making contact and the nature of the contact or complaint. Complaints normally contain the identity of the complainant and any other individuals involved in the complaint.

We will only use your personal information to:

- allow us to action your request
- allow us to properly investigate any complaint
- contact you in relation to any further information we require from you to action your initial request or complaint
- communicate with you, which may include responding to emails or calls from you
- review our training and processes in order to make improvements

#### **Job Applicants**

When we advertise job vacancies, we collect personal information from any communication and CV provided to us directly or through a recruitment company and use it to assess an applicant's suitability for the job.

#### HOW WE COLLECT YOUR PERSONAL INFORMATION

The table below explains how we collect the personal information we are the controller of:

Personal information collected	How we collect it
Name, address, email and other contact details	Provided in any email communication, enquiry or complaint
Business information relating to a supplier's or client's personnel	Provided by the supplier or client at the time of engagement or during ongoing performance of the
Name, address, contact details and other personal information submitted on a job application	Collected when an applicant applies for a job vacancy either from a communication or CV

#### HOW AND WHY WE USE YOUR PERSONAL INFORMATION

Under the data protection laws, we must always have a lawful basis for using personal information. When we process your personal information, we consider your rights under data protection laws as well as any potential impact to you. We will never place our interests above yours.

The table below describes how we may use your personal information, and our lawful bases for doing so.

What we use your personal information for	Our reasons for doing so and the legal basis
Improving and tailoring our websites, products and services	For our legitimate interests or those of a third party, e.g., to make sure we can continuously improve our services to you
Providing and administrating services	For the performance of our contract with clients or suppliers, or to take steps at their request prior to entering into a contract
Relationship and complaint management	For legitimate interests to be able to respond to any communications sent to us
Providing and administrating access to our systems Preventing fraud, unauthorised access	For our legitimate interests or those of a third party, e.g., to prevent and detect criminal activity that could be damaging for us and for them. For compliance with our
and modifications to systems Improving efficiency, training and quality control	legal and regulatory obligationsFor our legitimate interests or those of a third party, e.g.,to make sure we are following our own internalprocedures so we can continuously improve our service
Vetting of applicants	For our compliance with legal requirements and our legitimate interests in ensuring people are 'fit and proper' for the role. Where we do this, we provide individuals with a further privacy notice
Exercise or defend legal rights	Where necessary, for the establishment, exercise or defence of legal claims. The legal basis for this processing is legitimate interests so that we can protect and assert our legal rights, your legal rights and those of others

# WHERE AND HOW DO WE DO KEEP YOUR PERSONAL INFORMATION?

We take appropriate measures to ensure that all personal information is kept secure, including security measures to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We require our staff and all third parties to maintain high standards of safety and protection of personal information, including contractual obligations under which they undertake the protections of all personal information.

We also have procedures in place to deal with any suspected personal information security breach. We will notify you and any applicable regulator of a suspected personal information security breach, where we are legally required to do so.

To deliver services or manage our relationship with you, it is sometimes necessary for us to share your personal information outside the UK where we are based, such as when our service providers are located outside the UK. Personal information may also be held by other third parties as described below (see 'Do we share your personal information?').

## HOW LONG IS PERSONAL INFORMATION KEPT FOR?

We retain personal information for as long as is reasonably necessary for the purposes for which it was provided or collected, and to meet legal, regulatory or financial accounting requirements. This means we will retain some personal information after a contractual relationship has come to an end. Where this is the case, we will always look to minimise the personal information retained.

The retention period for personal information can vary depending on its nature, any potential risk of harm caused by unauthorised use or disclosure, and if we have any legal, regulatory, financial or other requirements.

## **DO WE SHARE YOUR PERSONAL INFORMATION?**

We may share your personal information with third parties for the following reasons:

- The use of service providers to help us operate our business effectively
- The use of service providers who provide systems and communications services to us
- We may share your personal information where we are required to do so by law or at the request of law enforcement

Where there is a need to transfer data to a supplier based outside of the UK, we will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Notice, and only to a country which the UK's supervisory authority (Information Commissioner's Office) has determined provides an adequate level of protection, or where the recipient is bound by standard contractual clauses according to conditions provided by the Information Commissioner's Office.

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers to ensure your confidentiality is maintained.

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

## **YOUR RIGHTS**

As a UK resident, you have the right to access personal information we hold about you and to ask that your personal information be corrected, updated, or deleted. More information can be found in the list below. If you would like to exercise this right, please see the 'Contact Us' section.

- The right to be informed about our collection and use of your personal information. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more.
- The right to access the personal information we hold about you.
- The right to have your personal information rectified if any of your personal information held by us is inaccurate or incomplete.
- The right to ask us to delete any of your personal information that we hold.
- The right to restrict the processing of your personal information.

- The right to object to us using your personal information for a particular purpose or purposes.
- The right to withdraw consent. This means that, if we rely on your consent as the legal basis for using your personal information, you are free to withdraw that consent at any time.

For more information on each of the rights above, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information Commissioner's Office (ICO) <u>www.ico.org.uk.</u>

# **CONTACT US**

To contact us about anything to do with your personal information and data protection, please contact our Customer Services department at:

Email address: <u>enquiry@appcouk.com</u> Postal Address: Studio 320B, Highgate Studios, 53-79 Highgate Road, London,. NW5 1TL.

Please do contact us if you have any concerns. We are confident that we can resolve any concern you may raise with us about our use of your information. However, in the event that we are unable to satisfy your concerns, you have the right to raise your concerns with the Information Commissioner who may be contacted at https://ico.org.uk/concerns or telephone: 0303 123 1113. The ICO's address is: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

# **CHANGES TO THIS NOTICE**

We may update this Privacy Notice from time to time. This may be because of changes in data protection laws, or we may change our business in some way that affects how we process personal information.

We recommend that you check this page regularly to keep up to date.

This Privacy Notice was last changed: 23rd December 2022