



## **PRIVACY NOTICE: WEBSITE CONTACTS**

### **THE KIND OF INFORMATION WE HOLD ABOUT YOU**

We collect, store and use personal data that you provide when you contact us either through the website or by email. The type of information will depend on what you provide to us. We do not ask you to provide “special categories” of information such as: racial origin; ethnic origin; political opinions; religious beliefs; membership of a trade union; genetic data; biometric data; health data; data concerning a person’s sex life; and sexual orientation. However, if you choose to provide us with this information (or other sensitive information such as disability or criminal convictions) because it is relevant to the reason you contacted us and we need to disclose it to someone outside IPReg, we will ask you for your explicit consent to do so.

### **HOW WE WILL USE YOUR INFORMATION**

We will use the information you provide to answer your request or query, based on your consent.

We may also use the information you provide for our legitimate interest in helping to inform our approach to regulation, for example to identify areas where we could improve the information we provide to the public or where we need to take action against an individual or firm that we regulate. We may summarise the areas we have identified in this way in our Annual Report or other publications, but we will not do this in a way that identifies any individual who has contacted us.

If you have complained to us about an individual or firm that we regulate, we will usually contact you to get more information about your complaint to help us decide what to do next. We usually have to disclose your identity to the individual or firm that you have complained about.

### **DATA SHARING**

We will not normally share your information with third parties, unless we are required to do so by law or you have made a complaint about an individual or firm that we regulate. Our IT contractors have access to our email system, but they will not normally need to read information about individual website contacts. All our third-party service providers including our IT contractors are required to take appropriate security measures to protect your personal information. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We will never share your personal data with other types of third party (such as marketing agencies) unless you give us your explicit consent to do so.

Emails that you send us are stored by Microsoft in the UK. Your personal information on our CRM system will not be transferred outside the EU/EEA and in most cases is stored in the UK. In some cases, for example, if emails are used as part of our consideration of a complaint, they may be backed up on servers in the USA. These transfers are covered by the EU-US Privacy Shield Framework.

## **DATA SECURITY**

We have put in place measures to protect the security of your information. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need.

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

## **DATA RETENTION**

### **How long will you use my information for?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## **RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

### **Your rights regarding personal information**

In certain circumstances, you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are processing it lawfully;
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process

it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing;

- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground;
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it;
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us.

### **No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **RIGHT TO WITHDRAW CONSENT**

In certain circumstances where you have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legal basis for doing so.

### **CONTACT DETAILS**

If you have any questions about this privacy notice or how we handle your personal information, please contact us. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

### **CHANGES TO THIS PRIVACY NOTICE**

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact us.

### **Change history record**

<b>Issue</b>	<b>Description of Change</b>	<b>Approval</b>	<b>Date of Issue</b>
1	First version	CEO	16 May 2018
2	Changes to reflect go live of new CRM system and related change to server provision	CEO	26 September 2019