



A GOMEZ LTD - PRIVACY POLICY

Your data will be controlled by A Gomez Ltd who may provide services to you or communicate with you and is therefore regarded as a controller of your personal data. The contact address of A Gomez Ltd is: Coldharbour Lane, Bridge, Canterbury, Kent, CT4 5HL.

We may revise this Policy at any time by amending this page. You are expected to check this page from time to time to take notice of any changes we make, as they are binding to you.

This Policy covers the following:

EXPLANATION OF APPLICABLE DATA

THE INFORMATION WE COLLECT AND WHERE WE GET IT

HOW WE USE THE INFORMATION WE COLLECT

GROUNDS FOR USING YOUR PERSONAL INFORMATION

HOW WE SHARE INFORMATION WITH THIRD PARTIES

RETAINING YOUR INFORMATION AND HOW WE SECURE IT

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A GOMEZ LTD COOKIES POLICY

HOW LONG WILL COOKIES REMAIN ON MY COMPUTER?

THIRD PARTY COOKIES

To find out more click on any of the above sections.

Explanation of applicable data

For the purpose of this policy, personal data refers to information that relates to an identifiable, living individual, including information such as an online identifier, for example an IP address. The General Data Protection Regulation (GDPR) applies to both automated personal data and to manual filing systems, where personal data is accessible according to specific criteria, as well as to chronologically ordered data and pseudonymised data.

Data referred to in the GDPR as 'special categories of personal data' (previously termed 'Sensitive Personal Data') specifically includes the processing of genetic data, biometric data and data concerning health matters.

"Personal information" is therefore any information that can be used to identify you or that we can link to you and which we at A Gomez Ltd have in our possession or control.

The information we collect and where we get it

A Gomez Ltd collects and therefore processes the following personal information about you:

Information that you provide to A Gomez Ltd

We will process personal information that you give to A Gomez Ltd including when you email us or contact us through various methods as follows:

- **Signing up for A Gomez Ltd services:** when you sign up for our newsletters, events or obtain any of our services, or when you contact us with queries, or respond to our communications the personal information you provide may include your full name, title,

telephone number, email address and additional content, date and time of your email correspondence and information about your current or previous employers or your business.

- **When providing A Gomez Ltd services:** if you are a client, partner or preferred supplier of A Gomez Ltd you will provide us with personal information when you, or the company you represent, become a client, partner or preferred supplier with us. If you are not a client, partner or preferred supplier we may still collect or receive your personal information because you are involved in one of our client's matters.
- **When participating in recruitment activities:** when you apply for any role with us, or with a client of ours if we are acting on their behalf, you may provide us with your full name, date of birth, nationality, education and qualification details, previous employment, your gender, your CV, photograph, passport details, driving licence, marital status, home address and home telephone number, mobile telephone number and other details set out in your communications to us.
- **To enable processing of payments and fraud prevention:** Financial and Payment Data including bank account details and other data necessary for processing payments and fraud prevention, including credit/debit card numbers, security code numbers and other related billing information may be collected.
- **To enable equality and monitoring:** When applying or joining A Gomez Ltd then your sensitive personal data (that is, information about your racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, or details of criminal offences, or genetic or biometric data) may be collected in order to carry out monitoring and comply with the legal obligations.
- **Applying for placements and work experience:** When you apply to us you for any potential work placement you may provide us with details such as your name, email address, postal address, place of education and employment details.

Other information A Gomez Ltd collect about you

A Gomez Ltd uses CCTV for the purposes of detection and prevention of crime and understands that recording images of identifiable individuals constitutes as processing personal information. Where CCTV is used it will be done in line with data protection principles. A Gomez Ltd will notify all colleagues and visitors of the purpose for collecting CCTV images via notice boards, letters and email, along with any retention rules on such data.

A Gomez Ltd will also collect information about use of our group services or when we otherwise interact or correspond with you. A Gomez Ltd use various technologies to collect and store information when you communicate with us or visit our websites. We may, for example, collect information about the type of device you use to access the websites, your IP address and your geographic location, the operating system and version, your browser type, the content you view and features you access on our websites, the web pages and the search terms you enter on our websites. For information about how we use Cookies and the choices you may have, please see our Cookies Policy below.

Information A Gomez Ltd obtain from other sources

- If you apply for a position with any part of the A Gomez Ltd, we may collect personal information relating to past employment, qualifications and education, opinions from relevant third parties about you, past employment history and other details about you, which may be provided to us by a third party that provides background screening services on our behalf.
- If we collect or receive your personal information in the relation to our provision of any of A Gomez Ltd services we might also receive information from third parties such as

your employer, other parties relevant to the services we are providing and others such as regulators and authorities. That information could include your name, contact details, employment details and other information relevant to the services that we are providing.

How we use the information we collect

We may do the following with your personal information that we have gathered:

1. use it to provide A Gomez Ltd services to a relevant client
2. use it to engage in marketing and business development activity in relation to our group services. This may include sending you newsletters, legal, human resources and health and safety updates, marketing communications and other information that we believe may be of interest to you
3. where you have applied for a position with us, to review and process your application
4. to comply with legal and regulatory obligations that we have a duty to discharge
5. use it to establish, exercise or defend our legal rights or for the purpose of legal proceedings
6. to record and monitor your use of our websites, social media or our other services for A Gomez Ltd business purposes. This may include analysis of usage, measurement of website performance and generation of marketing reports
7. use it for our legitimate business interests, such as for undertaking business research and analysis, managing the operation of our business and improving our websites and interfaces
8. use it to look into any complaints, concerns or issues you may have
9. use it to prevent and respond to actual or potential fraud or illegal activities.

A Gomez Ltd may also collate, process and share any statistics based on an accumulation of information held by us provided that any individual is not identified from the resulting analysis and the collation, processing and dissemination of such information is permitted by law.

Grounds for using your personal information

We rely on the following legal basis to process your personal information:

- **Consent:** A Gomez Ltd may in some circumstances need your explicit consent to use your personal information. You can withdraw your consent by contacting us.
- **Obligations of a contract:** A Gomez Ltd may need to collect and use your personal information to enter into a contract with you or to perform our obligations under a contract with you.
- **Legitimate interest:** A Gomez Ltd may use your personal information for what we identify as our legitimate interests.
- **Compliance with the law:** we may use your personal information as necessary to comply with applicable laws and regulations.

How we share information with third parties

We share personal information internally. We may also share your personal information outside of the company. This may include:

- Third party agents/suppliers or contractors, bound by obligations of confidentiality, in connection with the processing of your personal information for the purposes described in this Policy. This may include, but is not limited to, our IT and communications service providers, and insurance, pension or benefit providers if you are employed by us.
- Third parties relevant to the services that we provide. This may include, but is not limited to other service providers, regulators, authorities, governmental institutions.

- To the extent required by law, regulation or court order, for example, if we are under a duty to disclose your personal information in order to comply with any legal obligation.

Your personal information may in some circumstances be transferred to locations outside of the European Union/European Economic Area (EU/EEA) as well as within it for the purposes previously described above. We do not transfer your personal information outside Europe as a matter of course however, where we have a requirement to transfer your personal information outside the EU/EEA, we will ensure that it is protected and transferred in a manner consistent with legal requirements applicable to the information by for instance:

- The country to which we send the personal information may be approved by the European Commission
- The recipient may have signed a contract based on “contractual clauses” approved by the European Commission, obliging them to protect the personal information , or
- Where the recipient is located in the US, it may be a certified member of the EU-US Privacy Shield scheme.

In other circumstances, the law itself may permit us to otherwise transfer your personal information outside Europe. In all cases, however, any transfer of your personal information will be compliant with the applicable data protection law in place.

Retaining your information and how we secure it

How long A Gomez Ltd keeps your personal information will vary and will depend primarily on:

- The purpose for which we are using your personal information - we will need to keep the information for as long as is necessary for the relevant purpose
- Legal obligations - laws or regulation may set a minimum period for which we have to keep your personal information

A Gomez Ltd will retain your personal information for as long as necessary to fulfil the purposes that we collected it for and for A Gomez Ltd to assert or defend against legal claims. The appropriate retention period is determined by the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process and whether we can achieve those purposes through other means, and the applicable legal requirements.

Upon expiry of the applicable retention period we securely destroy your personal information in accordance with applicable laws and regulations. A Gomez Ltd ensures that the personal information that we hold is subject to the appropriate security measures.

Your choices and rights

You have a number of rights in relation to the personal information that A Gomez Ltd hold about you and you can exercise your rights by contacting us directly. These rights include:

- **Obtaining or accessing your data:** Regarding the processing of your personal information and access to the personal information which we hold about you. Please note that there may be circumstances in which we are entitled to refuse requests for access to copies of your personal information. In particular, information that is subject to legal professional privilege will not be disclosed other than to our client and as authorised by our client.
- **Correcting your data:** Requesting that we correct your personal information if it is inaccurate or incomplete.
- **Erasure of your data:** Requesting that we erase your personal information in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal information but we are legally entitled to retain it.

- **Objecting/Restricting us processing:** Requesting that we restrict our processing of your personal information in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal information but we are legally entitled to refuse that request.
- **Portability/Moving your data:** In some circumstances, receiving some personal information in a structured, commonly used and machine-readable format and/or requesting that we transmit that information to a third party where this is technically feasible. Please note that this right only applies to personal information which you have provided to us.
- **Withdrawing your consent:** In certain circumstances it may be lawful for us to continue processing without your consent if we have another legitimate reason (other than consent) for doing so.
- **Lodging a complaint about processing:** Complaining to the relevant data protection supervising authority (e.g. The Information Commissioners Office (ICO) in the UK), if you think that any of your rights have been infringed by us.

How to contact us and other important information

If you would like further information on the collection, use, disclosure, transfer or processing of your personal information by A Gomez Ltd or the exercise of any of the rights listed above, please contact us. You can do this by:

- Writing to us: A Gomez Ltd, Coldharbour Lane, Bridge, Canterbury, Kent, CT4 5HL
- Emailing us: privacy@agomez.co.uk
- Telephone us: 01227 833124

Date issued: 24th May 2018

A Gomez Ltd Cookies Policy

A Gomez Ltd websites (“Sites”) use a number of different cookies to improve the user experience and help it see what is popular with users:

- **Single session cookies.** These enable the Sites to keep track of your movement from page to page in order to ensure that you will not be asked for the same information you have previously given during your visit to the Sites. Cookies allow you to proceed through the Sites quickly and easily without having to authenticate or reprocess each new area you visit. We may use the cookies to analyse user behaviour, such as which pages have been visited during the session, in order to improve your overall experience, for example enabling us to determine and display more relevant content.
- **Remember me cookies.** These cookies enable the Sites to remember your personal preferences such as log in details in order to improve the user experience for example by avoiding you having to re-enter these details on each visit to the Sites.
- **Remember my language cookies.** These enable the Sites to retain your language preference for future visits in order to improve the user experience. In addition, this cookie will set the language in which the non-content aspects of emails received from the Sites will be displayed in.
- **Persistent cookies.** These cookies enable us to collect information such as number of visitors to the sites and pages visited in order to analyse user behaviour. This information is collected in an anonymous form and will be collated with similar information received from other users to enable us to compile reports in order to develop and improve user experience by displaying more tailored and relevant content for example.

How long will cookies remain on my computer?

Cookies remain in the cookies file of your browser after the closing of the browser, and will become active again when the Site is reopened, until removed. The cookie(s) can be deleted at any time by you. The cookie(s) will not collect any information when you are not accessing the Site.

Third party cookies

The single session and persistent cookies are provided on our behalf by a trusted third party service provider to aid in the reporting of user behaviour on the Sites. This behaviour is analysed to provide an improved user experience. The information collected is not linked to personally identifiable information.

A Gomez Ltd also use Google Analytics to help analyse use of Sites. Google Analytics generate statistical and other information about website use by means of cookies, which are stored by users’ web browsers on their computer. The information generated relating to our website is used to create reports about the use of the website. Google hold this information and provide us access to it. Google’s privacy policy is at <http://www.google.com/privacypolicy.html>

Date issued: 24th May 2018