

We take the privacy of applicants, our contacts and clients very seriously and we take great care to protect personal information.

By using our website and submitting your personal information to us, you consent to us processing your personal information in accordance with this policy.

We have updated this policy in light of the new General Data Protection Regulation (GDPR) which replaces the previous Data Protection Regulation (995/46/EC). This new Regulation aims to standardise data protection legislation across the EU and enhance the rights of individuals in respect of their privacy. The Regulations also create a stringent framework for commercial organisations, like ourselves, to work in.

This policy will outline how we collect and process your information so please take the time to read it carefully.

Firstly, here are a some declarations about us regarding our position in respect of your personal data, where we are and who is responsible:

- We, Conekt Ltd (No. 09284472) we are a data processor and occasional data holder for method of communication most likely via email and telephone with clients and suppliers.
- Our trading address is Conekt Ltd, WeWork 1 Mark Square, London EC2A 4EG
- Our registered address is Conekt Ltd, 2 Upperton Gardens, Eastbourne, East Sussex BN21 2AH
- The person in charge of data protection is Nathan Miller _ MD
- You can contact us on nathan.miller@conektltd.co.uk
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What is Personal Data

This is the biggest question in respect of your privacy, the simplest answer is that personal data is any piece of information that can identify you as a living individual. Personal data is categorised in two ways, general personal data such as your name, address, location and cookie data. The second is special personal data such as religious beliefs, health, race and ethnic origin – This category has a higher burden of protection for the data controller and Conekt Ltd does not hold information in this category.

Who are we

We are Conekt Ltd an introduction and procurement consultancy business specialising in the assessment of suppliers and buyers requirements in multiple sectors associated in majority to leisure, catering, events and hospitality.

Our aim is to provide procurement review and supply chain introduction as authorised by the supplier and requested by the buyer in the best way we can from an accredited and known list. The services we offer require us to engage suppliers, buyers, decision makers mainly via held email contacts and telephone numbers of those parties across multiple sectors and businesses.

How we get your data

The personal data we collect comes from three core sources;

- Supplier set up and application,
- Client request for services
- Open access data at companies house, websites and other authorised locations

We also collect and share data from and with third parties where there is a legitimate interest, for example supplier and buyer contact and financial institutions for the process of payments.

Personal data is collected in a number of ways, through our website, over the phone and in person. We will now outline the sorts of personal data we collect, how we use it and why for the sources listed above.

Client and supplier data

Anyone can apply to us for any number of different roles. Email, telephone or in-person. Our process pushes contact to our own, secure, site email where we collect name, address, postcode, CV, mobile number and email.

Other mediums in which client and supplier data can reach us is through referral sites, through social media platforms and in person.

All data is collected and processed by us in our offices and in our cloud services, all based within the EU. We use this personal data to;

- Verify identify or person and their commercial organisation (supplier & Buyer)
- Examine financial status of organisation
- Email to arrange personal meetings and diaries
- Notify of upcoming opportunities
- Marketing our services
- Engage suppliers and buyers in services of our consultancy
- Provide information, where required, to statutory or regulatory bodies
- To comply with legislation in respect of employment law

Client personal data

Although most of our clients are commercial entities we do engage with individuals on occasion. Where we do, and as above, any personal data we collect and process will be stored in our offices and in our cloud services.

3rd parties

Our legitimate interests in respect of personal data occasionally extend to third parties, again where this is the case any data collected will be processed in accordance with this policy. This personal data can be for;

- Marketing & advertising
- Processing work requirements for our services
- New business development
- Meeting legislative requirements
- The requirements of statutory, or regulatory bodies

What to do if you do not want your data processed

You should notify us of this request. Please note that in some cases your request may breach or nullify an agreement you have in place with us.

Data transfer out of the EU

Sometimes in the operation of our day to day business we may transfer data to countries or international organisations outside of the European Economic Area (EEA). This may, for example, be for applicants or clients, or third parties who provide support services to us. Where information is to be so transferred, it may be to a country in respect of which there is an adequacy decision from the EU Commission. However, if this is not the case, it is our policy to take steps to identify risks and in so far as is reasonably practicable, ensure that appropriate safeguards are in place.

Website use and cookies

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website, which enables the website to tailor its offerings to your preferences when you visit it.

We use cookies to help us:

- Make our website work as you'd expect
- Remember your settings during and between visits
- Improve the speed/security of the site
- Monitor user traffic patterns
- Understand how our visitors use our website
- Make our marketing more efficient

What all of this means is that you get the best possible user experience and the most relevant information based on your needs. Cookies enable us to constantly evolve, develop and improve functionality to provide you with the best possible user experience.

The sorts of cookies we use are;

- **Strictly necessary:** Just as it says, these are the essential cookies to enable you to contact us via our website. Accepting these cookies is a condition of using the site
- **Functionality:** These cookies help our site remember the choices you made for you.
- **Performance:** These cookies help us monitor the performance of our site, providing us with the information to constantly optimise and develop our site to get the best user experience for you, for example site visits or source of visitors.
- **Third party:** As you use our site, you will notice that we have content from other sites, eg; YouTube or Google Maps. We also facilitate the opportunity to engage with us further through social media channels, for example Twitter and Facebook. We use third party cookies to help deliver relevant information to you and integrate content with social networks.
- **Google Analytics:** These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

Data Retention

In most circumstances your data will not be retained for longer than 3 years from the last point at which we provided any services or otherwise engaged with you and it is our policy to only store your personal data for as long as is reasonably necessary for us to comply with our legal obligations and for our legitimate business interests. The following sets out the lengths of time we are required by law to retain your data or certain elements of your data:

- Clients: 7 years
- Suppliers: 7 years

Your rights

We take the protection of your personal data very seriously and it is important that you know your rights within that context, which include rights to:

- Request a copy of the personal data that we hold about you. If you would like to make a request for information, please contact nathan.miller@conektltd.co.uk
- Object to our processing of your data where that processing is based upon legitimate interest and there are no compelling grounds for the continued processing of that data
- Request that we restrict processing of your data in certain circumstances

- Request that data is erased where the continued use of that data cannot be justified. Unless we are required by law to keep for a period like transactional history for HMRC, These obligations will override any request to erase data or any objection to processing for so long as they must keep the data.
- Object to any decision, which significantly affects you, being taken solely by a computer or via another automated process
- Withdraw your consent to our processing of your personal data for a particular purpose at any stage. However, please note that we may continue to retain, or otherwise use your personal information thereafter where we have a legitimate interest or a legal or contractual obligation to do so. Our processing in that respect will be limited to what is necessary in furtherance of those interests or obligations
- Request inaccurate or incomplete data is rectified. We will respond to such a request within 1 month.
- Request that data provided directly by you and processed by automated means is transferred to you or another controller; this right only being applicable where our processing of your data is based either on your consent or in performance of a contract
- Make a complaint to the Information Commissioner's Office <https://ico.org.uk>
- Request that direct marketing by us to you is stopped.

Please note that should you exercise your right to request that we erase data or cease any processing activity, we may retain a record of this request and the action taken to both evidence our compliance, and to take steps to minimise the prospect of any data being processed in the future should it be received again from a third-party source.

If you have any questions concerning your rights or should you wish to exercise any of these rights please contact: nathan.miller@conektltd.co.uk

Policy Update: 25th May 2018 09:00 (GMT)