

# Privacy and Cookie Policy



## 1. Introduction

- 1.1 We are fully committed to the protection of individuals rights and privacy. The ways in which we process personal data will be in line with current data protection legislation, this policy will outline how this is achieved.
- 1.2 If you are using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.
- 1.3 If you are providing personal data to us on behalf of another you shall ensure this information is passed on accordingly to the data subject.

## 2. Collecting personal information

- 2.1 We may collect, store and use the following kinds of personal information:
  1. information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths);
  2. information that you provide to us when registering with our website (including your email address);
  3. information that you provide when completing your profile on our website (including your name, gender, address, and contact telephone number(s));
  4. information that you provide to us when using the services on our website, or that is generated in the course of the use of those services (including the timing, frequency and pattern of service use);
  5. information contained in or relating to any communication that you send to us or send through our website (including the communication content and metadata associated with the communication);
  6. If you choose to contact us by phone, all our telephone calls are recorded.
- 2.2 Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

## 3. Using personal information

- 3.1 Personal information submitted to us through our website, email or by phone will be used for the purposes specified in this policy or on the relevant pages of the website.
- 3.2 We may use your personal information to:
  1. administer our website and business;
  2. personalise our website for you;
  3. enable your use of the services available on our website;
  4. send you email notifications that you or your employer have requested;
  5. deal with enquiries and complaints made by or about you relating to our website;
  6. keep our website secure and prevent fraud; and
  7. verify compliance with the terms and conditions governing the use of our website.
- 3.3 We will not supply your personal information to any third party for the purpose of their or any other third party's direct marketing.

## 4. Disclosing personal information

- 4.1 We may disclose your personal information to any of our employees, officers, insurers, professional advisers, to your employer insofar as reasonably necessary for the purposes set out in this policy.
- 4.2 We may disclose your personal information:
  1. to the extent that we are required to do so by law;
  2. in connection with any ongoing or prospective legal, professional conduct or disciplinary proceedings;
  3. in order to establish, exercise or defend our legal rights;

4. to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

4.3 Except as provided in this policy, we will not provide your personal information to third parties.

### **5. Retaining personal information**

5.1 This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.

5.2 Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

5.3 Notwithstanding the other provisions of this Section 5, we will retain documents (including electronic documents) containing personal data:

1. to the extent that we are required to do so by law;
2. if we believe that the documents may be relevant to any ongoing or prospective legal, professional conduct or disciplinary proceedings; and
3. in order to establish, exercise or defend our legal rights.

### **6. Security of personal information**

6.1 We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

6.2 We will store all the personal information you provide on our secure servers. Our Information Security Management system is accredited to ISO 27001. We hold a Cyber Essentials Certificate issued under the National Cyber Security Centre (NCSC) endorsed Cyber Essentials Scheme. For further details, please visit:  
<https://www.iso.org/isoiec-27001-information-security.html>  
<https://www.cyberessentials.ncsc.gov.uk>

6.3 You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

6.4 Information that we collect will only be stored and processed in the United Kingdom.

### **7. Amendments**

7.1 We may update this policy from time to time by publishing a new version on our website.

7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

### **8. Your rights**

8.1 You have rights with regards to your personal data. If we collect, store or use your personal data you have the right to;

- a) request access to that personal data
- b) ensure that data is accurate and up to date, and where it is not, have that data rectified
- c) request that the personal data we hold about you is erased
- d) restrict our processing activities
- e) object to the processing of your personal data

8.1.1 Further information about your rights can be obtained from the Information Commissioners Office.

8.2 You may instruct us to provide you with any personal information we hold about you; provision of such information will require appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or accountant plus an original copy of a utility bill showing your current address).

8.3 Should you wish to lodge a complaint regarding our processing activities you have the right to do so with the Information Commissioners Office.

## **9. Updating information**

9.1 Please ensure that the personal information that we hold about you is correct and update any changes.

## **10. Cookies**

10.1 Our website uses “session” cookies that will expire at the end of the user session, when the web browser is closed.

10.2 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

10.3 Most browsers allow you to refuse to accept cookies; for example:

1. in Internet Explorer (version 11) you can block cookies using the cookie handling override settings available by clicking “Tools”, “Internet Options”, “Privacy” and then “Advanced”;
2. in Firefox (version 47) you can block all cookies by clicking “Tools”, “Options”, “Privacy”, selecting “Use custom settings for history” from the drop-down menu, and unticking “Accept cookies from sites”; and
3. in Chrome (version 52), you can block all cookies by accessing the “Customise and control” menu, and clicking “Settings”, “Show advanced settings” and “Content settings”, and then selecting “Block sites from setting any data” under the “Cookies” heading.

10.4 Blocking all cookies will have a negative impact upon the usability of many websites.

10.5 If you block cookies, you will not be able to use all the features on our website.

10.6 Deleting cookies will have a negative impact on the usability of many websites.

## **11. Data protection registration**

11.1 We are registered as a data controller with the UK Information Commissioner’s Office.

11.2 Our data protection registration number is Z6851755.

## **12. Our details**

12.1 This website is owned and operated by AVR Group Limited.

12.2 We are registered in England and Wales under registration number 1251842, and our registered office is at 16-24 Attenburys Park Estate, Attenburys Lane, Timperley, Cheshire WA14 5QE

12.3 You can contact us:

1. by post, using the postal address given at 12.2 above; or
2. by telephone, on the contact number published on our website from time to time.

## **13. Data Protection Officer**

13.1 We are required by GDPR to employ a Data Protection Officer (DPO). Our DPO can be contacted using the postal address given at 12.2 above.