

## Numitas privacy policy

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Numitas respects your privacy and is committed to protecting your data.

### 1. Introduction

This privacy policy tells you how Numitas use your personal data when you visit our website, interact with us, and buy our goods and services.

It also tells you about your privacy rights and how the law protects you.

It is important that you read this privacy policy, together with any other privacy policies we may provide, so that you are fully aware of how and why we are using your data.

This privacy policy was last updated on 14 August 2018.

If you have any questions, or would like to exercise your privacy rights, please follow the instructions in this privacy policy. See 'How to contact Numitas about privacy' below.

### 2. Our website and Numitas

Our website at numitas.com sells professional financial consulting services and promotes events hosted and run by Numitas, all of which are aimed at business owners – from start-ups and independent business to larger organisations – finance professionals and professional service firms. This website is not intended for children and we do not knowingly collect data relating to children.

### 3. Personal data which we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We collect a variety of information about our clients, event delegates and visitors to Numitas website. This personal data falls into these categories:

**Identity Data** includes title, first name, last name, job title, company name or similar identifier. If you interact with us through social media, this will include your social media user name.

**Contact Data** includes company or home address (where provided), email address and telephone numbers.

**Transaction Data** includes details about services you have purchased from us.

**Profile Data** includes preferences, feedback and survey responses.

**Usage Data** includes information about how you use our website, products and services.

**Marketing and Communications Data** includes your preferences in receiving direct marketing from us and your communication preferences.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## 4. How is your personal data collected?

We use different methods to collect data from and about you, including through:

**Direct interactions.** You may give us your Identity contact by filling in forms or by corresponding with us by post, phone, email or through chat or social media.

This includes personal data you provide when you:

- sign up to receive Numitas newsletter
- make enquiries or request information be sent to you
- order our services
- register on to an event hosted or run by Numitas
- ask for marketing to be sent to you
- engage with us on social media
- enter a competition, promotion or survey
- leave comments on our website or social media posts

**Third parties or publicly available sources.** We may receive personal data about you from various types of third parties, including:

- Identity and Contact Data from data partners
- Data from any third parties who are permitted by law or have your permission to share your personal data with us, such as via social media or review sites. We will only use your personal data when the law allows us to.

## 5. How we use your personal data

We use your personal data when we need to perform the contract we are about to or have entered into with you. When you purchase our services, that's a contract.

Where we need to comply with a legal or regulatory obligation. For example, keeping records of our sales for tax compliance.

Generally, we do not rely on consent as a legal basis for processing your personal data other than where the law requires it, for example in relation to sending certain direct marketing communications. Where our legal basis is consent, you have the right to withdraw consent any time.

## 6. Advertising, marketing and your communications preferences

We may carry out direct marketing by email, phone or post.

On our website, we make it clear what we are doing and what communications you will be sent and you have a right at any time to change your mind and say no thank you and opt out. The easiest way to opt out is to use the unsubscribe link at the bottom of the communication.

Of course, there are lots of different ways you'll see adverts for Numitas out and about, and not all of these are based on using personal data – sometimes we just buy good old-fashioned advertising space in the real world and websites and social media. If you see Numitas adverts on websites and in social media, these may not be directed specifically at you, we might just have bid for the space. But here's some things we may do that may be specifically directed at you:

- emails, for example Numitas newsletter or event invitations
- phone calls, to tell you something that might be relevant to you and your business.

## 7. Payment information

We don't keep any payment details in our accounting system. Any payment information is held on the banking system which only the Finance Managing Partner has access to.

## 8. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

## 9. Third-party links

Our website may include links to third-party websites, plug-ins and applications (for example, the ability to sign in with Facebook). Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 10. Your legal rights

If the General Data Protection Regulation applies to you because you are in the European Union, you have rights under data protection laws in relation to your personal data:

- The right to be informed –an obligation on us to inform you how we use your personal data
- The right of access – a right to make what's known as a 'data subject access request' for copy of the personal data we hold about you

- The right to rectification – a right to make us correct personal data about you that may be incomplete or inaccurate
- The right to erasure – also known as the ‘right to be forgotten’ where in certain circumstances you can ask us to delete the personal data we have about you (unless there’s an overriding legal reason we need to keep it)
- The right to restrict processing – in certain circumstances you can ask us to suspend processing personal data
- The right to data portability – you can ask us for a copy of your personal data in a common format (for example, a .csv file)
- The right to object – to us processing your personal data (for example, if you object to us processing your data for direct marketing)
- Rights in relation to automated decision making and profiling – we will be transparent about any profiling we do, or any automated decision making.

These rights are subject to certain rules around when you can exercise them. You can see a lot more information on them, if you are interested, on the UK Information Commissioner’s Office website.

If you wish to exercise any of the rights set out above, please contact us.

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

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

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 ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **11. How to contact Numitas about privacy**

If you have any questions about this privacy policy, or would like to exercise any of your rights, please email us at: [info@numitas.com](mailto:info@numitas.com)

## **12. Changes to this privacy policy**

The General Data Protection Regulation is new and the ICO is still issuing new bits of guidance about how businesses should follow it. So, you may see little updates to our privacy policy over the coming months. Be sure to check in and have read every now and then. Thank you.