

# Privacy Policy - UK

## Background

This policy explains when and why we collect personal information about you; how we use it, the conditions under which we may disclose it to others and how we keep it secure. This notice informs you of our commitment to the UK Data Protection Act 1998 (DPA) and the EU General Data Protection Regulation 2018 (GDPR).

The privacy and security of your personal data is very important to us. We take the responsibility seriously and want you to be confident in how we process your information.

This Privacy Policy explains how and why we, UIC Systems Ltd and UIC Consultancy Ltd trading as The Universal Improvement Company (The UIC), use your personal data, your rights and our obligations to you.

This Privacy Policy applies if you're a customer, employee or use any of our services, visit our website, e-mail, call or write to us.

We may, in certain circumstances, provide specific privacy notices related to individual items but they will always refer to this Privacy Policy.

We will never sell your data and will only share it with companies when it is necessary, there is a legitimate interest, or where explicit consent has been given and the privacy and security of the data is assured.

We will continue to monitor our processes and if, in certain circumstances, we need to update our Privacy Policy we will notify you.

## Who we are

We are an organisational improvement specialist providing consultancy, facilitation and training in strategy development and implementation, project management, process improvement, team working, leadership and data.

We also provide a variety of specialist IT systems.

UIC Systems Ltd is registered as a Private Limited Company in England and Wales: 09683219.

UIC Consultancy Ltd is registered as a Private Limited Company in England and Wales: 10056202

Both companies are a registered data controller with the Information Commissioners Office.

The ICO register number for UIC Systems Ltd is: ZA213831.

The ICO register number for UIC Consultancy Ltd is: ZA213840.

Any reference to 'us', 'we', 'our', 'data controller' is in reference to either UIC Systems Ltd or UIC Consultancy Ltd. Any reference to 'data subject' is in reference to individuals whose data we process.

If you have any Data Protection concerns you can direct them to our Data Protection Officer at [info@theuic.com](mailto:info@theuic.com).

## **Data Protection Principles**

Personal Data must be processed in accordance with six Data Protection Principles under the DPA and GDPR. It must:

- Be processed fairly, lawfully and transparently
- Be collected and processed only for specified, explicit and legitimate purposes
- Be adequate, relevant and limited to what is necessary for the purposes for which it is processed
- Be accurate and kept up to date to the best of our knowledge. Any inaccurate data will be rectified or deleted without delay
- Not be kept for longer than is necessary for the purposes for which it is processed; and
- Be processed securely.

We are accountable for any non-compliance with these principles. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with the principles of the DPA and GDPR.

## **What data we collect and how we use it**

Under the DPA there are two types of personal data (personal information) that you may provide to us:

- Personal data: is the general information that you supply about yourself – such as your name, address, gender, date of birth and contact details;
- Sensitive personal data: is, by its nature, more sensitive and may include your racial or ethnic origin, health or criminal convictions. We do not request or hold this type of data.

Our key reasons for collecting data to then be processed are listed below.

- Marketing and selling (including direct marketing to individuals)
- Other consultancy and advisory services

We will ask for relevant information to enable us to fulfil our obligation to you or provide the service requested.

During the process of data collection we will ask for your consent to enable us to contact you with information about services available to you. These choices form your marketing communication preferences and will determine the type of information we send you.

Your consent will be, where possible, requested at the point you supply the data. We may request your data for a single specific use but will always refer back to this privacy policy.



## **Legal basis for processing your data**

In order to process your information we must have a lawful reason for doing so. The four most common reasons why we process your data are as follows;

- Contractual
- Legitimate interest
- Consent
- Legal Obligation

We will only process (use) your personal information if we have:

- A contract with you or your company to provide a service or product. We will use your personal data accordingly e.g. as a legitimate interest in order to provide the service or information required e.g. we will pass your details to our data processors, agreed by contract, to print and send your Yearbook.
- Your express consent that we have on record to allow us to send you specific communications.

## **What is Legitimate Interest?**

This is the legal ground for us to process your personal information if we have a genuine and legitimate reason for doing so. Legitimate interests do not harm your rights and interests as an individual.

Examples of where we would use grounds of legitimate interest to process your data would include the following.

- To send you your Yearbook
- Confirm your right to request a manual update via our website
- To send you invites to courses and conferences

We will only use your personal data on the relevant lawful grounds as detailed above. We will do this in accordance with the EU General Data Protection Regulations (GDPR) which come into effect on the 25th May 2018 and the Privacy and Electronic Communications Regulations (PECR).

## **Marketing data**

We will never send you marketing communications without your specific consent. Upon receiving your consent to marketing, we will then process your information for marketing purposes in line with your preferences. If you choose not to consent to marketing when a request is made, this will have no effect on accessing our services.



## **Who we share your data with**

We use external companies who have all been required to provide evidence of Data Protection Compliance. Your information will not be used for anything other than the required service detailed in the Data Sharing agreement between the UIC and the third party Data Processor.

## **How do we protect your Personal Data?**

We are fully committed to ensuring your information and privacy are protected in accordance with your rights under DPA and GDPR.

We are committed to protecting the data we hold about you and ensuring it is secure, private and confidential. We have put in place robust technical, physical and managerial controls to protect the confidentiality, integrity and availability of information we hold about you.

We operate a robust and thorough process for assessing, managing and protecting new and existing systems which ensures that they are up to date and secure against the ever changing threat landscape. Our staff are given information security and data protection training as part of an induction process and annually thereafter to reinforce responsibilities and requirements set out in our information security policies.

When you trust us with your data we will always keep your information secure to maintain your confidentiality. By utilising strong encryption when your information is stored or in transit we minimize the risk of unauthorised access or disclosure; when entering information on our website, you can check this by right clicking on the padlock icon in the address bar.

## **How long will we keep your data for?**

We will only use and or store your information for as long as it is required for the purpose it was collected. The purpose will determine how long it will be kept. This can sometimes be to meet a statutory or legal requirement. If we have explicitly informed you of the length of time we will securely destroy the data in question once that time has lapsed.



## Your rights

You have a number of rights under GDPR and this section briefly highlights them. For more information visit [www.ico.org.uk](http://www.ico.org.uk) (<http://www.ico.org.uk/>)

- (1) The right to be informed - We need to inform you what we are collecting and why. This privacy policy and any related fair processing notice provides this information.
- (2) The right of access - You have the right of access to your personal data and supplementary information. This information is free unless there is unreasonable effort upon which a charge may be made by the Data controller. A request is required in writing and must be specific to a set of data and or a time frame for when the data is required. The UIC must provide you with this information within one month; this may be extended to two months dependent on the nature and complexity of the request.

If you would like to make a request, please contact us by e-mail using [info@theuic.com](mailto:info@theuic.com) or write to us at Data Request, Unit C2, First Floor, Millennium House, 40 Nantwich Road, Crewe CW2 6UF. You will be asked to provide the following details:

- The personal information you want to access
- Where it is likely to be held
- The data range of the information you wish to access

If we do hold personal data about you we will give you a copy of the information in an understandable format together with an explanation of why we hold and use it.

- (3) The right to rectification - The right to have your personal data rectified if it is incomplete or inaccurate.
- (4) The right to erasure - The right for the deletion of data where there is no compelling reason for its continued processing.
- (5) The right to restrict processing - The right to suppress or restrict processing. The data controlled could retain the data but no longer process it.
- (6) The right to data portability - The right to retain their own personal data and use it across multiple services.
- (7) The right to object - The right to object to process for legitimate interest, direct marketing and scientific purposes.
- (8) Rights in relation to automated decision making and profiling - Right to object to automated decision making.



## **Cookies, Tracking and Websites**

Cookies are small text files that are placed on your computer by websites that you visit or certain e-mails you open. They are widely used in order to make websites work, as well as to provide business and marketing information to the owners of the site.

There are no non-essential cookies on the UIC website and we do not use any cookies for tracking or marketing purposes.

If you use our website, your IP address is automatically registered to enable us to measure visitor frequency and for security purposes. We also may use this information to help us better understand usage of our website.

We also use session cookies, also known as an in-memory cookie or transient cookie.

Here's an explanation of what this does:

A user's session cookie for a website exists in temporary memory only while the user is reading and navigating the website. When an expiry date or validity interval is not set at cookie creation time, a session cookie is created. Web browsers normally delete session cookies when the user closes the browser.

For more info: [http://en.wikipedia.org/wiki/HTTP\\_cookie#Session\\_cookie](http://en.wikipedia.org/wiki/HTTP_cookie#Session_cookie)

We use these cookies for our course booking system and our client flipchart viewer.

## **What to do if you are not happy**

If you are unhappy with anything related to your personal information please contact us directly so that we can resolve any problem or query. You can contact us directly at [info@theuic.com](mailto:info@theuic.com).

You also have the right to contact the Information Commissioners Office (ICO) if you have any questions about Data Protection. They are contactable via the phone on 0303 123 113 or visit their website [www.ico.org.uk](http://www.ico.org.uk) (<http://www.ico.org.uk>).

## **Changes to this Privacy Policy**

We may amend this Privacy Policy from time-to-time to ensure that it remains up-to-date and reflects clearly how we use your personal data. Please visit our website to keep up with any changes. We will not amend anything that will affect your rights. The current version is always posted on our website.

This Privacy Policy was last updated on 12 June 2021.

