



ROUNDHILL ASSOCIATES

GDPR: DATA PRIVACY NOTICE FOR CLIENTS AND SUPPLIERS

Roundhill Associates Ltd ("We") are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, phone number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

Roundhill Associates Ltd is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: Roundhill Associates, 3rd Floor, 207 Regent Street, London, W1B 3HH. For all data matters contact Sam Boden on enquiries@roundhillassociates.co.uk



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3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

To inform individuals and businesses of our products and services and to maintain our own accounts and records.

You may give us information about you by filling in forms on our site www.roundhillassociates.co.uk (our site) or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to our services, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey and when you report a problem with our site.

We are also working closely with some third parties, such as Local Authorities, whom provide publicly accessible data that we use and process for purposes of providing our products and/or services, together with business and property information available in the public domain and your own business website.

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- **Information you give to us.** We will use this information:
 - to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
 - to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
 - to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will contact you by Phone, Email or Post with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you.
 - to notify you about changes to our service;
 - to ensure that content from our site is presented in the most effective manner for you and for your computer.
- **Information we collect about you.** We will use this information:
 - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - to improve our site to ensure that content is presented in the most effective manner for you and for your computer;



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- to allow you to participate in interactive features of our service, when you choose to do so;
 - as part of our efforts to keep our site safe and secure;
 - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
 - to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
- **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- Personal data [Company and/or Trading name, name of company directors, telephone numbers associated with your business, personal phone numbers, personal and/or business email, business address, registered address, home address]

We have obtained this personal data from publicly accessible sources, such as the Local Authority and your own business listings and website information. This information may also be supplied to us by you directly.

5. INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- **Information you give us.** You may give us information about you by filling in forms on our site www.roundhillassociates.co.uk (our site) or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to our service, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey and any other activities commonly carried out on the site. The information you give us may include your name, address, e-mail address and phone number, business and personal addresses and additional business premises information associated with our services.
- **Information we collect about you.** With regard to each of your visits to our site we may automatically collect the following information:
 - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;



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- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- **Information we receive from other sources.** We may receive information about you if you use any of the other websites we operate or the other services we provide. [In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this site.] We are also working closely with third parties, such as Local Authorities, that provide publicly accessible data that we use and process for purposes of providing our products and/or services.

6. What is our legal basis for processing your personal data?

a) Personal data (article 6 of GDPR)

Our lawful basis for processing your general personal data:

✓ Consent of the data subject;	Where you have provided us with permission to do so.
✓ Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract	Where you have signed a Roundhill Associates 'CONTRACT' and authorised us to act on your behalf.
✓ Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject	We process data in line with the legitimate business interests of the company. To advertise, sell and/or offer our products and/or services. We will never sell or share your data with any other third-party company until such time as you have entered into contract with us. Data will only then be shared with relevant third parties involved in the delivery of our services and/or products.

7. WHERE WE STORE YOUR PERSONAL DATA



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All information collected by us and provided to us by you is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

8. Sharing your personal data

Your personal data will be treated as strictly confidential and will not be shared or sold to any third-party. Where we have entered into contract with you, your data will only be shared relevant third parties involved in the delivery of our services and/or products.

9. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary and we only retain your data for the following purposes. Contractual purposes, administration and marketing purposes, legal requirements and complaints procedures.

10. Providing us with your personal data

You are under no statutory or contractual requirement or obligation to provide us with your personal data. But failure to do so will have the following consequences – inability to perform our duties and offer services and/or products as contractually outlined.

11. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official



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authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

13. ACCESS TO INFORMATION

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act.

14. YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at enquiries@roundhillassociates.co.uk

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

15. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

16. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact us at – C/O Roundhill Associates, 3rd Floor, 207 Regent Street, London, W1B 3HH or via email; enquiries@roundhillassociates.co.uk

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.