

# PRIVACY & COOKIE POLICY

## Introduction

Chalk Circle Ltd is committed to protecting your personal information. It's your information, and we respect that. Our Privacy Policy gives you detailed information on when and why we collect your personal information, how we use it and how we keep it secure. This Policy also sets out your right to request that we delete, update, transfer or provide you with access to your personal information. This Policy should be read alongside our Terms & Conditions. Please also note that this Privacy Policy only applies to personal information obtained by us - not information collected from your interactions with third parties.

## Who we are and how to contact us

The Sites (Offices & Website), and our Services (e.g. Security & GDPR Consultancy, Managed Security Services and Training, etc.) are operated by Chalk Circle Ltd.

If you have any questions about this Privacy Policy or want to exercise your rights set out in this Privacy Policy, please contact us by sending an e-mail to [privacysars@chalk-circle.com](mailto:privacysars@chalk-circle.com).

Chalk Circle Ltd is the data controller responsible for your personal information and is registered at the UK Information Commissioner's Office.

Chalk Circle Ltd is an English company with registered company number: 7224828 and whose registered office is at 4 Mount Ephraim Road, Tunbridge Wells, Kent, TN1 1EE.

## How we collect your personal information

Generally, we collect your information when you decide to interact with us. This could include marketing activity, events, security consultancy, security and data protection services, procurement and supply chain engagement, health & safety requirements or other activities in the performance of our business operations (e.g. contacting us over the phone, when you sign up to receive emails from us, etc). We also look at how customers use our website, so that we can offer the best possible experience.

We collect information in a number of ways which are listed below:

- When you register or use Chalk Circle Ltd website (the "Website")
- When you are registered on the Chalk Circle Ltd customer relationship system
- When you are registered on the Chalk Circle Ltd finance systems
- When you are registered on the Chalk circle Ltd customer support ticketing system
- When you contact Chalk Circle Ltd by telephone, E-Mail, Linked In, Twitter or Slack
- When you enter any event, prize draws or competitions run by Chalk Circle Ltd.
- When completing any surveys that we send to you for research purposes (although you are under no obligation to complete these)
- When completing any forms for transactional, employment or other purposes
- When you buy products or services
- When you visit our website: we may use cookies to help make the experience of using our website better and to personalise the service you receive from us - this means we may remember your previous visits and track the pages on our website that you visit. For more information please see our Cookie Policy. When you visit

www.chalk-circle.com the Chalk Circle Ltd web server may automatically record your public internet protocol ('IP') address.

- From time to time, we may also get data about you from third parties. This could include other customers, partners, agencies or 3<sup>rd</sup> parties that we have run partnerships, competitions and events with.

### **The types of information we collect**

We only collect the information that's necessary to carry out our business, provide the particular service you've requested and to keep you up to date about all the latest exciting Chalk Circle Ltd news.

### **Information we may obtain directly from you**

Here are some examples of information we collect about you when you interact with us:

- Title
- Name and Surname
- Email address
- Date of Birth
- Contact phone number(s)
- Interactions with us e.g. contacting our Customer Service
- Bank details
- Delivery address(s)
- Billing address
- Attendance at events
- Medical fitness information
- Dietary Requirements
- Employee information
- IP Addresses
- Company details
- Logs, device information and alerts
- Automatically populated IP address\*
- Information from cookies\*\*

\*When visiting our website we may collect an automatically populated IP address. An IP address is a unique number which allows a computer, group of computers or other internet connected device (such as your mobile or tablet) to browse the internet. We may also record the time and date of your visit, the pages that were requested, the referring website (if provided) and your internet browser version.

\*\*For further information about Cookies and how Chalk Circle Ltd uses them, please read our Cookie Policy.

### **Information we obtain independently from you:**

Your information may be shared with us by independent organisations, for example other organisations that Chalk Circle Ltd has worked with. These independent organisations will only do so when there is a lawful basis to do so. You should check their Privacy Policy when you provide your information to them, to understand fully how they will process and safeguard your data. These independent organisations may include:

### **Third Party Organisations.**

We may combine information you have given to us with additional information made available from / shared with us by external sources. This will only be done when we both have a lawful basis to do so.

#### **Information updates.**

From time to time we may screen our database against recognised data files such as National Change of Address file to help us keep our database up to date.

#### **Social Media.**

Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, you may give us permission to access information from those accounts or services.

#### **Information available publicly.**

We may include information found in places such as Companies House and information that has been published in for example articles / newspapers / online.

#### **Ensuring your personal information is only used where lawful**

In order for our use of your personal information to comply with applicable data protection law, that use by us needs to fall under at least one of the specific lawful reasons that are set out in applicable data protection law. Examples of these lawful reasons include our use of your personal information being necessary for the purchase of goods or services, or for compliance with a legal obligation.

Where your personal information is completely anonymised, we do not require a legal basis to use it as the information will no longer constitute personal information that is regulated under data protection laws. However, our collection and use of such anonymised personal information may be subject to other laws where your consent is required.

In certain circumstances we may be exempt from the requirements of data protection laws and the need for a lawful basis for processing when providing security monitoring and alerting of log information as defined in such laws. Where this is the case we will highlight this situation to you and make you aware.

Where your personal information is not in an anonymous form, we will have a lawful reason to use your personal information in such a way to ensure that we provide the very best products to you and our other customers.

#### **Why we collect your personal information and how we use it**

At Chalk Circle Ltd we like to get to know our customers - after all, this is how we find new ways to provide you with an extraordinary experience. We use information about you in a number of ways, including providing services that you have requested, offering you a personalised experience and informing you about special events or exciting Chalk Circle Ltd news. We might also use the information we have to contact you about any information we might need to process your request (e.g. support services, helpdesk issues or operational queries, for example) or;

- to carry out our business and to provide a service or carry out a contract with you;
- provide fulfilment of and delivery of products and services you have ordered. We may share your personal information with our delivery partners, sub-processors and third parties;
- Process payments. Chalk Circle Ltd does not store any payment card numbers once the transaction has been completed. We share your personal information with credit card companies and other payment providers.
- Contact you with important information relating to your enquiry or issue, such as, letting you know about risks, health and safety, service outages or maintenance updates. We share your information with our communication partners for this purpose where we need to.

**Where we have your consent:**

- Send you marketing updates via email about all the latest news and events at Chalk Circle Ltd. You can unsubscribe at any time by clicking the link in any email. We share your personal information with a variety of third party email marketing providers who assist us in delivering our email marketing campaigns to you. Third Parties include: Gmail, ConvertKit & Hubspot.
- We may tailor emails and online advertising to the things you love, so they're relevant to your location, what you have shown an interest in and the things you buy from us.

**Where we have justifiable reason (legitimate interest):**

- Events. We share your personal information with any applicable third party hosting the event and ticketing companies such as Eventbrite.
- Respond to customer service enquiries raised online, social media or on the phone.
- Invite you to provide feedback about our products and services in the form of online email surveys. We use this information to help us improve the quality of service provided; to monitor the quality of our products and services and to assist with the selection of future product and service lines
- Conduct postal marketing. We share your personal information with a variety of third party postal providers who assist us in delivering our postal marketing campaigns to you, including the Post Office and Royal Mail.
- Analyse aggregated customer information with other interactions customers have with Chalk Circle Ltd in order to continually improve the services we offer and streamline Security & Data Protection operations, website and systems. We do this using Google Analytics.
- Use of our local in office guest Wi-Fi at our offices or those of our customers where we supply such services; automatic re-connection when you return into the location.
- Measure and understand how our customers respond to a variety of marketing activity so we can ensure our activity is well targeted, relevant and effective.
- To help us run the test version of our website that we use internally to pilot new features and ensure the smooth running of our web services.
- To keep our database accurate and relevant, we may do this for example, using National Change of Address.

- The use of CCTV recording equipment in and around our premises for monitoring and security purposes. We may share where necessary CCTV footage to the Police and HMRC in particular. This is very strictly controlled.
- Detect and reduce fraud and credit risk.

### **Sharing your information**

We use third party platforms to manage and deliver email marketing campaigns; online advertising, customer analytics, events; booking of appointments, fulfilment of orders, delivery, financial management, IT services; etc. In providing the services, your personal information will, where applicable, be used by the service provider on our behalf.

We will check any third party that we use to ensure that they can provide sufficient guarantees regarding the confidentiality and security of your personal information. We will have written contracts with them which provide assurances regarding the protections that they will give to your personal information and their compliance with our data security standards and international transfer restrictions.

### **Business Administration and Legal Compliance**

In certain circumstances, we share and/or are obliged to share your personal information for business administration and legal compliance purposes with third parties outside of Chalk Circle Ltd.

We may use your personal information in connection with a business transition (such as a merger, acquisition by another company, or a sale of all of or portion of our assets), to enforce our legal rights and or to protect the rights of third parties and it is in our legitimate interest to do so. In such instances it will be necessary to share your personal information with external professional advisors such as lawyers and accountants, or insurers or financial institutions.

We may use your personal information for legal compliance purposes and to enforce our legal rights. In such instances it will be necessary to share your personal information with external parties such as administrative authorities (HMRC), police and public prosecutors or to comply with a court order. It is our legal obligation to do so.

### **How can I unsubscribe from marketing communications?**

We would be sad to say goodbye, but if at any point you do not wish to hear from us there are a number of ways you can unsubscribe.

These are as follows:

- You can click onto the "unsubscribe" link in any marketing communication that we send to you by email which will automatically unsubscribe you from that type of communication. Each "unsubscribe" link only relates to that specific type of communication (e.g. marketing communications or survey communications). This means that unsubscribing from marketing communications will not automatically unsubscribe you from our survey communications (or vice versa). Please also note that you may continue to receive communications which are already on route to

you for a short period of time while your relevant unsubscribe request is being processed.

- Alternatively, you can contact us via e-mail at the following address [privacysars@chalk-circle.com](mailto:privacysars@chalk-circle.com).

Should you wish for your details to be removed from our systems completely, then you will need to contact our customer services using the contact details above.

The Website 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 Chalk Circle Ltd does not accept any responsibility or liability for these policies. Please check these policies before you submit any personal details to these websites.

### **Our use of cookies and similar technologies**

Our website and emails contain certain cookies, pixels, records and other technologies of which you should be aware.

### **Third Party Links and Services**

Our website and emails contain links to third party websites and services. Please remember that when you use a link to go from our Sites to another website or you request a service from a third party, this Privacy Policy no longer applies.

### **Children**

We do not knowingly collect Personal Data from children under the age of sixteen (16) from our Website. If you are under the age of sixteen (16), please do not submit any Personal Data through our Website. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children never to provide Personal Data through the Website without their permission. If you have reason to believe that a child under the age of 16 has provided Personal Data to us through the Website, please email us at, [privacysars@chalk-circle.com](mailto:privacysars@chalk-circle.com); and we will endeavor to delete that information from our databases.

### **How long do we keep your personal information for?**

We keep your personal information in line with our company retention policy. We only retain information for as long as it is required.

### **Confidentiality and security of your personal information**

We are committed to keeping the personal information you provide to us secure and we will take reasonable precautions to protect your personal information from loss, misuse or alteration. We do not sell your personal information for any purpose.

We have implemented information security policies, rules and technical measures to protect the personal information that we have under our control from:

- unauthorised access;
- improper use or disclosure;
- unauthorised modification; and
- unlawful destruction or accidental loss.

All of our employees and data processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with the processing of personal information, are obliged to respect the confidentiality of the personal information of all users of our Services.

### **How to access your information and your other rights**

You have the following rights in relation to the personal information we hold about you:

- Your right of access
- Your right to correct information
- Your right to delete information
- Your right to restrict information
- Your right to data portability
- Your right to object
- Your rights in relation to automated decision-making and profiling
- Your right to withdraw consent
- Your right to lodge a complaint with the supervisory authority

### **Changes to this Privacy Policy**

We may make changes to this Privacy Policy from time to time.

To ensure that you are always aware of how we use your personal information we will update this Privacy Policy from time to time to reflect any changes to our use of your personal information. We may also make changes as required to comply with changes in applicable law or regulatory requirements. We will notify you by e-mail of any significant changes. However, we encourage you to review this Privacy Policy periodically to be informed of how we use your personal information.

### **Cookies Policy**

Cookies make your chalk-circle.com experience more enjoyable - and below we have explained exactly what they are, why we use them and how they work.

#### **What is a cookie?**

A cookie is a text file containing small amounts of information which are downloaded to your computer or mobile device when you visit a website. Cookies do lots of different jobs, such as letting you navigate between pages efficiently, remembering your preferences and

goods and services you wish to purchase, and providing you with content that is relevant to you and your interests. You can find more information about cookies from these websites:

[www.allaboutcookies.org](http://www.allaboutcookies.org)  
[www.aboutcookies.org](http://www.aboutcookies.org)  
[www.youronlinechoices.eu](http://www.youronlinechoices.eu)

By using our website and our other online services, you agree to our use of cookies as described in this policy.

### **What cookies does Chalk Circle Ltd Use?**

Here's a list of the main cookies we use, and what we use them for:

#### **Google Analytics**

We use cookies provided by Google Analytics to help us understand how you got to our website, measure the effectiveness of our advertising and understand how visitors use our website. The information helps us learn things such as what pages are more attractive to our visitors, which of our products most interest our customers and the kind of offers our customers like to see. To opt out go to <https://tools.google.com/dlpage/gaoptout>.

#### **\_ga, \_gid,**

Google Analytics uses these cookies to discover when you first visited our site, how often you come back and how long you spend on our website. The information stored by these cookies can be seen only by the relevant teams at Chalk Circle Ltd and Google and never shows any confidential information.

### **How up to date is the information in this policy?**

We will update this policy if we introduce new cookies or change the way we use the cookies described above.

### **Third party websites**

Our website contains links to websites managed by third parties. We don't know what cookies those other websites use. Please check the cookies policies of those third-party websites if you would like to know more.

**END OF POLICY**