

Privacy Statement

TCC is committed to your privacy and adheres to the General Data Protection Regulations (GDPR). This statement sets out how we use your personal data and your rights.

Your personal information will be held by TCC, registered as The Consulting Consortium Ltd for the purpose of the EU General Data Protection Regulation (GDPR).

TCC is the Controller of personal data relating to the professional individuals within its client or prospective client firms, for the purposes of relationship management, marketing and business development. This statement relates to this data only.

Personal Data We Collect

TCC collects your personal data, including information provided in various ways. Some of this data is gained directly from you, including:

- In emails, during telephone calls and conversations, from business cards, when registering for services, when participating in surveys, and when using TCC's websites.

Some personal data may also be gained indirectly, such as:

- Information gained through other organisations (for example LinkedIn) whether or not this is in the course of providing regulatory compliance services to you. [Learn more here.](#)
- Information we gather from your use of, and interaction with, our website and the devices you use to access them, using technology such as cookies.

The data that we collect will depend upon our interactions with you, the privacy settings and features that you choose. The personal data we collect normally includes names, job title, company, IP addresses and contact details such as phone numbers and email addresses. [Find out more.](#)

How we use Personal Data

TCC will only process your data where it has a legal basis for doing so. TCC uses the data collected to communicate with you and to offer you our regulatory consultancy services and/or services related to our sister company Record Sure Limited which offers technology systems and services that are complimentary to the services provided by TCC. We will also use your data to improve or maintain the services we offer to you and our website. We will never share your data with any other third party, other than those stated in this policy, nor use your data for any other purpose, unless we firstly gain your consent to do so.

We may use your data for profiling in the context of segmentation and targeting for marketing purposes. We may use personal data such as job title, sector, company and your previous activity on our website or with our marketing communications.



This enables us to provide you with information and promotions that are likely to be relevant to you. We may also use data such as your name and job title to personalise communications you receive from TCC and our website.

You have the right to access rectify, erase, object and restrict the processing of your personal data, with the ability to choose which promotional communications you wish to receive and how you would like to receive them. You also have the right to opt-out of receiving our marketing communications at any time. To manage your subscriptions or personal data, please see the Your Rights section.

Our legal basis for processing personal data

Our legal basis for processing your personal data may rely upon our Legitimate Interest or Legal Obligation. Further information can be found [here](#).

Recipients of Personal Data

TCC shares your data with the following third-party service providers. The data storage and processing systems are protected by access controls, to minimise any risk to the integrity or security of your personal data, and the data is stored in servers in the UK, EU and USA.

- Salesforce / Pardot
- Typeform
- WordPress, hosted by WP-Engine
- Unbounce
- Go to Webinar
- Microsoft Sharepoint
- Access Dimensions

TCC will ensure that any third-party processor has adequate data protection measures in place that align with the requirements of the GDPR by conducting periodic due diligence. TCC will not share your data with any third-party processor outside of the UK, EU or USA.

TCC does not sell your personal data or other information to any third-party.

We may also share certain personal data with our sister company Record Sure Limited if TCC believes that you may benefit from the complimentary technology services and systems that Record Sure offers.

You have the right to object to this information being shared with Record Sure Limited.

Once TCC has received your information TCC is committed to ensuring it has all necessary technical and organisational controls in place to keep your information secure. In order to prevent unauthorised access or disclosure TCC has put in place suitable physical, electronic and managerial procedures to safeguard and secure the information TCC collects.

Retention period

TCC will only keep your personal data for as long as necessary for the purposes for which it was gained. Personal data will be retained for the purposes of direct marketing, relationship management and business development, or where we have another legal basis for processing (such as your consent or a contract with you). TCC will review the personal data we hold on you every 12 months to check for accuracy and relevancy and to ensure that we continue to have a legal basis for processing. If the personal data is no longer necessary, or where we no longer have the legal basis for processing, we will delete or fully anonymise the data we hold on you, in line with our GDPR Policy. If your data becomes inaccurate, we will update it accordingly.

The exception is information collected from surveys, feedback and questionnaires, which are held only for the duration of its usefulness i.e. the duration of a campaign. The data is then anonymised and retained for internal evidential purposes, or deleted.

Complaints

TCC will be more than happy to help you should you have any complaints about the processing of your personal data. Under the GDPR, you have the right to lodge a complaint with the Supervisory Authority, the Information Commissionaires Office (ICO), who are the national authority responsible for the protection of personal data. A complaint can be made to the ICO via their website: ico.org.uk or through their helpline: 0303 123 1113.

How we use your data

The table below sets out further detail on the ways in which we will use your data.

Personal data category	Example data fields	Legal basis for processing	How we collect this data
Personal identifiable information	Name, surname, job title/roles, company name, description (containing adhoc information such as biographies, previous names), CF / SM functions,	Legitimate interest: For evidential purposes to manage and maintain records of client/ prospect relationships/ communications	Directly from you: you may have voluntarily provided some of this information during the course of our conversations with you or you may have provided it by

	LinkedIn profile link, assistant's name, IP address, cookies strings.		filling in a form on our website. Indirectly: we may obtain some of this information from referrals from third parties or publicly available information online i.e. LinkedIn. Passively from you: your IP address and cookies are passively provided by your computer when you access our website.
Contact information	Work phone number, work email address, work mobile number, department, office address, location, assistant's phone, assistant's email address,	Legitimate interest: To contact you by telephone, direct marketing or individual email to arrange meetings with our experts in relation to work or knowledge sharing	Directly from you: you may have voluntarily provided some of this information during the course of our conversations with you or you may have provided it by filling in a form on our website. Indirectly: we may obtain some of this information from referrals from third parties or publicly available information online i.e. LinkedIn.
Business development conversations	Notes of all conversations, email exchanges, meetings and meeting notes,	Legitimate interest: For evidential purposes to manage and maintain	Directly from you: you may have voluntarily provided some of this information during the course

	website enquiries relevant to business development activity.	records of client/ prospect relationships/ communications	of our conversations with you or you may have provided it by filling in a form on our website. Indirectly: we may obtain some of this information from referrals from third parties or publicly available information online i.e. LinkedIn.
Work and opportunity information	Brief descriptions, relevant contact information and financial information relating to work won or bid for, including copies of tender responses	Legitimate interest: For evidential purposes to manage and maintain records of client/ prospect relationships/ communications	Directly from you: you may have voluntarily provided some of this information during the course of our conversations with you.
Digital communications interaction (website and email)	Dates and times of forms completed, downloaded content, pages visited and duration, webinars attended/viewed, emails opened/clicked, referral sources, search requests, opt-in/out of email marketing. Some of this data is obtained using cookies. Find out <u>what cookies are</u> and how we use them.	Legitimate interest: Where the processing enables us to enhance, modify, personalise or otherwise improve our services and communications for the benefit of our customers Legitimate interest: To better understand how people interact with our website and content in order to enhance the	Directly from you: you may have voluntarily provided some of this information by filling in a form on our website or clicking specific links i.e. opt-out link. Passively from you: your IP address and cookies are passively provided by your computer when you access our website.

		customer experience Legitimate interest: To determine the effectiveness of promotional campaigns to inform marketing strategy	
Surveys, feedback and questionnaires	These are specific to the survey.	Legitimate interest: Where the processing enables us to enhance, modify, personalise or otherwise improve our services and communications for the benefit of our customers Legitimate interest: To better understand how people interact with our website and content in order to enhance the customer experience Legitimate interest: To determine the effectiveness of promotional campaigns to inform marketing strategy	Directly from you: you may have voluntarily provided this information by filling in a form on our website or a third-party online survey facility. Passively from you: unless the survey is anonymous, cookies and your IP address are passively provided by your computer when you complete the survey.

Your rights

As a data subject on which we process personal data, you have various rights that you can exercise:

Your right	What this means	How you can exercise
The right to access	<p>You have the right to request from us:</p> <ul style="list-style-type: none"> • Whether personal data is being processed • The purpose of the processing • The categories of personal data • To whom the data has been disclosed • How long it will be stored 	<p>You can request this information at no charge from TCC by emailing datarequest@tcc.group. TCC will provide you with the information requested within one month of your request.</p>
The right to rectification	<p>You have the right to request that we change or update your personal information if it is incorrect</p>	<p>You can request an update or change to your information by emailing datarequest@tcc.group. TCC will update your details within one month of your request.</p>
The right to erasure	<p>You have the right to have your data erased from our systems when:</p> <ul style="list-style-type: none"> • It is no longer necessary for the purpose it was processed • Our legal basis for processing is no longer applicable • Data has been unlawfully processed • In compliance with a legal obligation 	<p>As set out in 'retention period', your data will be erased when it is no longer necessary for the purpose it was originally processed or after 12 months.</p> <p>You can request erasure of your information by emailing datarequest@tcc.group. TCC will update your details within one month of your request.</p>
The right to restrict processing	<p>You have a right to restrict us processing your data if:</p> <ul style="list-style-type: none"> • You contest the validity of our data and believe it 	<p>You can request restriction of your personal data by emailing datarequest@tcc.group. TCC will restrict your details within one month of your request.</p>

	<p>should be restricted until verified.</p> <ul style="list-style-type: none"> • You object to processing and we are considering the request • You would prefer your data to be restricted rather than erased when processing has been unlawful • TCC no longer needs the data but you require it to exercise or defend a legal claim. 	
The right to object	We use legitimate interest for direct marketing. You have a right to object to us using your personal information for these purposes.	To object to TCC using your personal data for direct marketing please click here . Opting out will take a maximum of 24 hours.
Rights related to automated decision making and profiling	<p>We use legitimate interest for profiling. You have a right to:</p> <ul style="list-style-type: none"> • Request the details of any personal data used for profiling including the categories of data. • Request information on the profile/the profile itself and details of the segments you have been put into. • Request rectification 	To request this information or object to TCC using your personal data for profiling email datarequest@tcc.group . TCC will cease profiling with your personal data as soon as the request is received and respond to your access request within one month of your request.

	<p>and/or erasure of the personal data used as inputs to the profiling and the output data (the profile itself).</p> <ul style="list-style-type: none"> • Object to us using your personal information for these purposes. 	
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Legal Basis

TCC relies upon the following legal bases for processing the personal data obtained from the practices outlined in [Personal Data we Collect](#).

Legitimate interest

'Legitimate Interest' means the interests of our company in conducting and managing our business to enable us to give you the best services and experience. For example, we have an interest in making sure our services are relevant for you, so we may process your personal data to contact you by telephone with discussions tailored to your interests.

When we process your personal information for our legitimate interests, we make sure to consider the balance and any potential impact on you (both positive and negative) and your rights under the data protection regulation. Our legitimate business interests do not automatically override your interests – we will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Our legitimate business interests may include some or all of the following:

- For evidential purposes to effectively manage and maintain records of our relationships/communications with you;
- For business development related activity such as contacting you by telephone or email to arrange meetings with our experts in relation to work or knowledge sharing;
- To enhance, modify, personalise or otherwise improve our services and communications for the benefit of you;
- To better understand how you interact with our website and content in order to enhance your customer experience;
- To determine the effectiveness of promotional campaigns to inform marketing strategy.

Legal obligation

Sometimes we will process your personal data to enable us to comply with our obligations to the FCA when carrying out a Section 166 Skilled Person's Review.

Cookies

What are cookies?

Cookies are small text files that are generated by the website that you are viewing, allowing the website to store information as you navigate web pages. These text files contain session data that can be useful to improve your browsing experience. All of the cookies used by TCC are safe for your computer and they only store information that is used by the browser. These cookies cannot execute code and cannot be used to access content on your computer. Many of these cookies are necessary to ensure the proper functioning of the website. They do not contain malware or viruses. Other cookies improve user experience by storing previously viewed and downloaded content or to remember preferences (like form field values).

You can choose to accept or decline cookies. This may prevent you from taking full advantage of TCC's websites. [Learn more.](#)

How TCC uses cookies

TCC uses cookies to distinguish you from other users of TCC's websites. This helps us analyse statistical data about our webpage traffic and monitor individual tracking data to improve our website in order to tailor it to visitor needs. We may use cookies and an IP tracking code to collect data.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages and content you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

TCC uses the following cookies:

Performance cookies – TCC uses these cookies to measure the performance of TCC's websites through Google Analytics, such as visitor numbers, time spent on site and stores you (anonymously) as a visitor to our website. These are necessary cookies and the information is used for statistical purposes and does not identify you as an individual user. You cannot block these cookies unless you do so on your own computer, instructions for doing so can be found below.

Functionality cookies – TCC uses these cookies to recognise you when you return to our website through our marketing automation system, Pardot. This enables us to personalise our content for you, greet you by name and remember your preferences. You can deny us access to these cookies within the cookies notice or below.

Targeting cookies – TCC uses these cookies to record your visit to TCC's websites, the pages you have visited and the links you have followed through our marketing automation system, Pardot. TCC will use this information to make TCC's websites more relevant to your interests. You can deny us access to these cookies within the cookies notice or below.

What cookies TCC uses

Google Analytics

TCC uses Google Analytics to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages visited.

Cookie Name	Description
_utma	Google Analytics: We use Google Analytics to monitor traffic levels, search queries and visits to this website.
_utmb	Google Analytics stores IP address anonymously on its servers in the US, and neither CIVIC or Google associate your IP address with any personally identifiable information.
_utmc	These cookies enable Google to determine whether you are a return visitor to the site, and to track the pages that you visit during your session.
_utmz	These cookies are set only after the user has given consent to us to use cookies.

Additional Information:

[Google Analytics Privacy Policy](#).

You can choose to [opt out of Google Analytics](#).

Pardot

TCC uses Pardot to track what individual users are doing on our website (such as pages visited and documents downloaded) and compiles this information into a visitor profile. Pardot sets [first-party cookies](#) for tracking purposes, and sets [third-party cookies](#) for redundancy. Using first-party and third-party cookies together is standard in the marketing automation industry. Pardot cookies do not store personally identifying information, they store only a unique identifier.

Cookie Name	Description
visitor_idxxxxx	Visitor Cookie: The visitor cookie includes the name “visitor_id” plus the unique identifier, which is derived from the tracking code placed on your site. The value stored is the unique ID for the visitor. For example, cookie name “visitor_id12345” stores the visitor value “123456789,” where 12345 is the account identifier and 123456789 represents the visitor ID. This cookie is set by our tracking code on visitors and prospects.
pardot	Pardot App Session Cookie: The session cookie named “pardot” is only set if you’re logged into our app as a user (i.e. prospects will not have this cookie set).

Additional Information:

<http://www.pardot.com/faqs/prospects/pardot-track-activities/>

How can I block cookies

You can block the cookies TCC uses on our website in two ways:

1. Opt-in or Opt-out of all but necessary cookies for TCC’s website only
2. Block all cookies within your computer’s configuration settings

Opt-in or Opt-out of all but necessary cookies for TCC’s website only

Use the buttons below to agree or deny the use of all but necessary cookies on TCC's websites. Please note if you do not agree to cookies some of the website functionality may be lost.

Block all cookies within your computer's configuration settings

You can allow, eliminate, or block all cookies (even the ones we deem necessary) in your computer's configuration settings according to the internet browser you are using. In certain cases, some web services and website functionality will be blocked when certain cookies are not allowed to operate correctly or when they are blocked by you. These links explain how to deactivate or block cookies in common web browsers:

- Internet Explorer: <http://windows.microsoft.com/en-us/windows-vista/block-or-allow-cookies>
- Safari: <https://support.apple.com/en-us/HT201265>
- Chrome: <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=en>
- Firefox: <https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>
- Opera: <http://www.opera.com/help/tutorials/security/cookies/>
- Android: <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DAndroid&hl=en-GB&oco=1>
- Windows Phone: <http://windows.microsoft.com/en-us/windows7/block-enable-or-allow-cookies>
- BlackBerry: <https://supportforums.blackberry.com/t5/Web-and-WebWorks-Development/How-to-Enable-browser-cookies-for-a-blackberry-browser/td-p/211133>

It may also be helpful to view the link <http://www.youronlinechoices.com/>. Here you can find useful information about how to configure cookie usage by website, as well as set general cookie preferences for your browser, including preferences for third-party cookies and advertising cookies.

3rd party list

TCC may obtain data indirectly about you from publicly available sources and via referrals from third party individuals and companies.

The publicly available sources we may obtain personal data from you include:

- Social media sites where you have a publicly accessible profile, such as LinkedIn
- Your company websites
- The FCA register

Your colleagues, associates and acquaintances may pass on your personal data to TCC's employees by way of referral because they think TCC and/or Recordsure's services may be relevant to you. TCC will process this data to make contact with you.

We may collect a range of personal work-related data from these sources such as:

- Names
- Job title



- Company
- Email address
- Phone Number
- Significant function
- Company Address

We protect the data obtained from third parties according to the practices described in this statement.