

Privacy Statement: Website Visitors & Clients

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 webinars, 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 and 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 we have 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
- Demio
- Zapier
- 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.

TCC stores personal information on a secure database which is shared with our sister company Record Sure Ltd.

Although data is stored centrally, communication is generally segmented between the separate companies. Signing up to either mailing list will provide content from the relevant company, and subscribers can opt in or out of the respective mailing lists on an individual basis. However, we may communicate content via email from both companies when we believe the information will be relevant and valuable.

You can opt into the TCC mailing list [here](#) to receive our regular newsletter featuring updates on regulatory developments, analysis and insights. In addition, we may send ad hoc emails containing valuable information such as white papers and event invitations.

To subscribe to the Recordsure mailing list, please visit the Recordsure website [here](#).

Where possible we will tailor the content we send subscribers to keep it relevant, for example, if you work in compliance we will try to share compliance specific material with you. You have the right to opt out of content tailored on your profile information by ticking the relevant box on our [Preferences page](#).

Once TCC has received your information we are committed to ensuring we have 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 Commissioner's 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.

Are you a future/current employee or associate/contractor?

If so, you should read our other privacy statements that relate to the processing of your personal data for the purposes of human resource management and processing of job applications.

[Privacy Statement: TCC Employees](#)

[Privacy Statement: Associates/Contractors](#)

Changes to this Privacy Statement

We reserve the right to change this statement. Changes will be published on our website tcc.group/privacy-statements/ and previous versions will continue to be [available here](#). We will notify you of any material changes to this statement via email (where possible) but recommend that you also check this statement regularly, so that you are informed of any changes.

Version 4.0 | 21st June 2019

Privacy Statement: How We Use Your Data

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

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| <p>Personal identifiable information</p> | <p>Name, surname, job title/roles, company name, description (containing adhoc information such as biographies, previous names), CF / SM functions, LinkedIn profile link, assistant's name, IP address, cookies strings.</p> | <p>For evidential purposes to manage and maintain records of client/ prospect relationships/ communications</p> | <p>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.</p> <p>we may obtain some of this information from referrals from third parties or publicly available information online i.e. LinkedIn.</p> <p>your IP address and cookies are passively provided by your computer when you access our website.</p> |

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| <p>Contact information</p> | <p>Work phone number, work email address, work mobile number, department, office address, location, assistant's phone, assistant's email address,</p> | <p>To contact you by telephone, direct marketing or individual email to arrange meetings with our experts in relation to work or knowledge sharing</p> | <p>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.</p> <p>we may obtain some of this information from referrals from third parties or publicly available information online i.e. LinkedIn.</p> |
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| Business development conversations | Notes of all conversations, email exchanges, meetings and meeting notes, website enquiries relevant to business development activity. | For evidential purposes to manage and maintain records of client/ prospect relationships/ communications | 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. 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 | For evidential purposes to manage and maintain records of client/ prospect relationships/ communications | you may have voluntarily provided some of this information during the course of our conversations with you. |

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| <p>Digital communications interaction (website and email)</p> | <p>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.</p> | <p>Where the processing enables us to enhance, modify, personalise or otherwise improve our services and communications for the benefit of our customers</p> <p>To better understand how people interact with our website and content in order to enhance the customer experience</p> <p>To determine the effectiveness of promotional campaigns to inform marketing strategy</p> | <p>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.</p> <p>your IP address and cookies are passively provided by your computer when you access our website.</p> |
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| <p>Surveys, feedback and questionnaires</p> | <p>These are specific to the survey.</p> | <p>Where the processing enables us to enhance, modify, personalise or otherwise improve our services and communications for the benefit of our customers</p> <p>To better understand how people interact with our website and content in order to enhance the customer experience</p> <p>To determine the effectiveness of promotional campaigns to inform marketing strategy</p> | <p>you may have voluntarily provided this information by filling in a form on our website or a third-party online survey facility.</p> <p>unless the survey is anonymous, cookies and your IP address are passively provided by your computer when you complete the survey.</p> |
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Privacy Statement: Your Rights

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

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| <p>The right to access</p> | <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 dataprotection@tcc.group.</p> <p>TCC will provide you with the information requested within one month of your request.</p> |
| <p>The right to rectification</p> | <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 dataprotection@tcc.group. TCC will update your details within one month of your request.</p> |

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| <p>The right to erasure</p> | <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 dataprotection@tcc.group.</p> <p>TCC will update your details within one month of your request.</p> |
| <p>The right to restrict processing</p> | <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 should be restricted until verified. - 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. | <p>You can request restriction of your personal data by emailing dataprotection@tcc.group</p> <p>TCC will restrict your details within one month of your request.</p> |

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| 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 and/or erasure of the personal data used as inputs to the profiling and the output data (the profile itself). – Object to us using your personal information for these purposes. | <p>To request this information or object to TCC using your personal data for profiling email dataprotection@tcc.group.</p> <p>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> |

Privacy Statement: 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' 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.

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.

Privacy Statement: 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. _____

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:

- These cookies are necessary for the website to function and cannot be switched off in our systems. These cookies do not store any personally identifiable information. You cannot block these cookies unless you do so on your own computer (instructions for doing so [can be found below](#)), but some parts of the site (including the Cookies Manager) will not then work.

- 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](#).

– These cookies enable the website to provide enhanced functionality and personalisation. They may be set by us or by third party providers whose services we have added to our pages, such as video hosters (Vimeo and YouTube). If you do not allow these cookies then some or all of these services may not function properly. You can deny us access to these cookies using the instructions [below](#).

– 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. This enables us to personalise our content for you, greet you by name and remember your preferences. TCC will use this information to make TCC’s websites more relevant to your interests. You can deny us access to these cookies using the instructions [below](#).

What cookies TCC uses

^ Detailed cookie list

Strictly Necessary Cookies

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personally identifiable information.

Cookies used

- OptanonConsent
- OptanonAlertBoxClosed

Performance Cookies

These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our site, and will not be able to monitor its performance.

Cookies used

- _gat_UA-116919071-1
- _gat
- _ga
- _gid

Functional Cookies

These cookies enable the website to provide enhanced functionality and personalisation. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies then some or all of these services may not function properly.

Cookies used

- __atuvs
- __atuvc

Targeting Cookies

These cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites. They do not store directly personal information, but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.

Cookies used

- visitor_id#####
 - pardot
 - visitor_id144011-hash
-

linkedin.com

- lidc
- bscookie
- bcookie
- UserMatchHistory
- lang
- lissc

pi.pardot.com

- visitor_id#####
- lpv144011
- visitor_id144011-hash
- pardot

pardot.com

- visitor_id144011-hash
- visitor_id#####

addthis.com

- xtc
- uvc
- loc

s7.addthis.com

- __atuvc
- __atufs
- __atufs

| | |
|------------------|--|
| ads.linkedin.com | <ul style="list-style-type: none">- lang |
| go.pardot.com | <ul style="list-style-type: none">- pardot- visitor_id#####- visitor_id144011-hash |
| google.com | <ul style="list-style-type: none">- NID |

Manage your cookie preferences

You can switch on and off cookies according to your preferences in the cookie manager. Here you can agree to, 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.

[Cookie Settings](#)

How can I block cookies

You can allow, eliminate, or block all cookies (even the ones we deem necessary) in your computer's configuration settings according 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.

Privacy Statement: 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](#).