

Privacy Statement: Website Visitors & Clients

TCC is committed to your privacy and adheres to GDPR and PECR. This statement sets out how we use your personal data and your rights.

TCC is committed to your privacy and adheres to the General Data Protection Regulations (GDPR) and the Data Protection Act 2018 to ensure protection of your personal data. We also adhere to the Privacy and Electronic Communications Regulations (PECR) to protect your privacy rights when carrying out direct marketing activities.

Your personal information will be held by TCC, registered as The Consulting Consortium Ltd.

TCC is the Controller of personal data relating to the professional individuals within its client or prospective client firms. We use this data in the process of providing our services to clients and for the purposes of relationship management, direct marketing and business development. This statement relates to personal data used for this purpose only. Please refer to our other statements if you are [an associate](#) or [prospective employee](#).

^ Personal Data We Collect

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

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

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

- From other organisations and public sources (for example LinkedIn). [Learn more here.](#)
- 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, cookie strings 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, carry out our services and to conduct direct marketing of our services and 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 obtain your explicit consent to do so.

We may use your data for profiling. This means we may use all the personal data we hold on you from a variety of sources to build up a picture of your interests, behaviours and preferences. This profile may combine personal data such as job title, sector, company with your interactions with our website and marketing communications obtained through cookies. We may also enrich this information with other intelligence derived from social media, conversations we have with you or inferred insights from people similar to you. We use these profiles to segment you into certain audience types to target our direct marketing and this enables us to provide you with information and promotions that are likely to be relevant to you. These profiles are not solely automated (we use both human analysis and technology to form these profiles).

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. You also have the [right to object](#) to our profiling and enrichment activities and can [opt-out](#) of receiving our marketing communications at any time.

^ 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. Where the data is stored in the USA, the company (Salesforce) is certified by the EU-US Privacy Shield.

- **Salesforce / Pardot** – customer relationship management and marketing automation software that is necessary to process your data securely.
- **Typeform** – survey software necessary to gather responses to questionnaires used as part of marketing activities or feedback.
- **Demio** – webinar software necessary to host webinars and manage attendance.
- **Zapier** – workflow automation apps necessary to transfer data from software we use, such as from Typeform to Salesforce.
- **Microsoft Sharepoint** – intranet and file storage and management for TCC projects. This is necessary to store some of your data securely, particularly as part of the services we are providing.
- **Access Dimensions** – financial management platform. Your data may be stored here relating to any invoicing activity undertaken.

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 (Recordsure). Although data is stored centrally, communication is segmented between the separate companies. You can manage your [TCC email preferences here](#). To unsubscribe from Recordsure emails use the unsubscribe link within the email.

Where possible we will tailor the content we send subscribers to keep it relevant, for example, if you work in compliance we will share compliance specific material with you.

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 obtained. 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 where we have a contract to provide our services to 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. [Find out how to contact TCC to exercise your rights.](#)

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 5.0 | 23rd July 2020

Privacy Statement: Indirect Data Sources – 3rd Party List

TCC may obtain personal data indirectly about you from publicly available sources and via referrals from third party individuals and companies. We may use this data to enrich the data we hold on you from directly acquired sources to build a profile on you. [Find out more](#) about how we use data for profiling.

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

- LinkedIn
- Your company websites
- The FCA register
- The media

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 process a range of personal work-related data from these sources such as:

- Names
- Job title
- Company
- Qualifications
- Email address
- Phone Number
- Significant function
- Company Address
- Indications of your challenges and interests from your social media posts, likes, comments and shares
- Indications of your challenges, interests and opinions from media articles

We protect the data obtained from third parties according to the practices described [in this statement](#).

Version 5.0 | 23rd July 2020

[manage cookies](#)

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. You can [manage your cookie preferences](#) here.

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, some of which is personally identifiable information.

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. We may also use this information to enrich the personal data we hold on you to create profiles. [Find out more about profiling.](#)

What cookies TCC uses

- ∨ Detailed cookie list
-

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.

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 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.

Version 5.0 | 23rd July 2020

[manage cookies](#)

Privacy Statement: 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, LinkedIn profile link, assistant's name, IP address, cookies strings. | Legitimate interest: For evidential purposes to manage and maintain records of client/ prospect relationships/ direct marketing / communications | <p>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.</p> <p>Indirectly: we may obtain some of this information from referrals from third parties or publicly available information online i.e. LinkedIn.</p> <p>Passively from you: your IP address and cookies are passively provided by your computer when you access our website.</p> |

| | | | |
|------------------------------------|--|---|---|
| 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 | <p>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.</p> <p>Indirectly: we may obtain some of this information from referrals from third parties or publicly available information online i.e. LinkedIn.</p> |
| Business development conversations | Notes of all conversations, email exchanges, meetings and meeting notes, website enquiries relevant to business development activity. | Legitimate interest: For evidential purposes to manage and maintain records of client/ prospect relationships/ direct marketing/ communications | <p>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.</p> <p>Indirectly: we may obtain some of this information from referrals from third parties or publicly available information online i.e. LinkedIn.</p> |

| | | | |
|--|---|---|--|
| 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/ direct marketing/ 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. | <p>Legitimate interest: Where the processing enables us to enhance, modify, personalise or otherwise improve our services and direct marketing for the benefit of our customers</p> <p>Legitimate interest: To better understand how people interact with our website and content in order to enhance the customer experience</p> <p>Legitimate interest: To determine the effectiveness of promotional campaigns to inform marketing strategy</p> | <p>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.</p> <p>Passively from you: your IP address and cookies are passively provided by your computer when you access our website.</p> |

| | | | |
|---|--|--|--|
| <p>Surveys, feedback and questionnaires</p> | <p>These are specific to the survey.</p> | <p>Legitimate interest: Where the processing enables us to enhance, modify, personalise or otherwise improve our services and direct marketing communications for the benefit of our customers</p> <p>Legitimate interest: To better understand how people interact with our website and content in order to enhance the customer experience</p> <p>Legitimate interest: To determine the effectiveness of promotional campaigns to inform marketing strategy</p> | <p>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.</p> <p>Passively from you: unless the survey is anonymous, cookies and your IP address are passively provided by your computer when you complete the survey.</p> |
|---|--|--|--|

| | | | |
|---|--|---|---|
| <p>Intelligence on your interests, challenges and preferences</p> | <p>These are specific to the data subject.</p> | <p>Legitimate interest: Where the processing enables us to enhance, modify, personalise or otherwise improve our services and direct marketing communications for the benefit of our customers</p> | <p>Directly from you: you may have voluntarily provided this information during our conversations with you.</p> <p>Indirectly: we may obtain some of this information from referrals from third parties or publicly available information online i.e. LinkedIn and the media.</p> |
|---|--|---|---|

Version 5.0 | 23rd July 2020

[manage cookies](#)

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

‘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.

[manage cookies](#)

Privacy Statement: 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 dataprotection@tcc.group.</p> <p>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 dataprotection@tcc.group. TCC will update your details within one month of your request.</p> |

| | | |
|---|---|---|
| <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> |

| | | |
|---|---|---|
| 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. | <p>You can object to TCC processing your data for our legitimate interests by emailing dataprotection@tcc.group. TCC will cease processing within 1 week of your request being received.</p> <p>To object to TCC using your personal data for direct marketing please click here. Opting out will take a maximum of 24 hours.</p> |
| Rights related to profiling and enrichment. | <p>We use the legitimate interest legal basis 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 or enrichment, 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 enrichment 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 and enrichment with your personal data as soon as the request is received and respond to your access request within one month of your request.</p> |

[manage cookies](#)