

## BUSINESS MOVES – PRIVACY POLICY

#### Who we are.

This is the privacy policy of Business Moves Group Limited, a company registered in England and Wales (company number 04927047) whose registered office is at 4 Acre Road, Reading, Berkshire, RG2 0SX. We are committed to complying with GDPR, protecting and respecting your privacy. This privacy policy explains what personal information we collect and how we will use it.

## When do we collect personal information and what personal information do we collect?

We may collect personal information about you as follows:

- If you fill in forms on our website, we will collect your contact details and the other information you provide in the form.
- If you contact us by any other means (e.g. email or telephone), we may keep a record of that contact and the information you provide us at that time.
- If you instruct us to provide services to you, we will collect a range of information which is required to provide those services including contact details and your job title/position; financial data, such as bank account details; and transaction data, including details about the services we have provided and payments received from you. Further details are set out in our terms and conditions of business.
- We may collect personal data relating to third parties in the course of providing services to our customers, including contact details of the various parties involved in an instruction and any relevant suppliers.
- We may also collect personal data in the form of business contact details for our customers, contacts and persons working within our industry, for the purposes of advising you on occasion of information which we believe will be of interest to you.
- If you ask to be added to our marketing database, we will collect your name, the name of your company/organisation (if any), email address and your preferences as to the types of marketing information you would like to receive from us. The emails that we send you may contain tracking facilities, which may include the opening of emails, forwarding of emails, the clicking of links within the email content, times, dates and frequency of activity and other data relevant to the production of an enhanced user experience.
- If you apply for employment or work with us, we will collect a range of information relating to you which is outlined in more detail in our candidate privacy notice.

#### Cookies

Our website uses cookies to better your experience while visiting our website. Where applicable our website uses a cookie control system allowing you on your first visit to the website to allow or disallow the use of cookies on your computer / device. This complies with legislation requirements for websites to obtain explicit consent from users before leaving behind or reading files such as cookies on a user's computer / device.

Cookies are small files saved to the user's computers hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within our website.

BMG/PrivacyPolicy/v4 Document Date: 21<sup>st</sup> May 2024 Reviewed: May 2024 Next Review Date: May 2025 Users are advised that if they wish to deny the use and saving of cookies from our website on to their computers hard drive they should take necessary steps within their web browsers security settings to block all cookies from our website and its external serving vendors.

#### Links to other websites and social media

Our website may, from time to time, contain links to other websites (including external social media platforms) which may be of interest to you. If you follow a link, please note that the other website will have its own privacy policy and you should check this before you submit any personal information to that website. We are not responsible for the content of other websites or their use of your personal information.

This website may also use social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media account.

Users are advised to take caution and good judgement before clicking any shortened URLs published on social media platforms by this website and its owners. Despite the best efforts to ensure only genuine URLs are published many social media platforms are prone to spam and hacking and therefore this website and its owners cannot be held liable for any damages or implications caused by visiting any shortened links.

## How do we use your personal information?

- If you visit our website, we will use information about your visit to help us make our website experience as user-friendly for as many visitors as possible on the basis that we have a legitimate interest to do so.
- If you fill in forms on our website, or contact us by any other means, we use the information you provide to respond to your enquiry or contact you on the basis that we have a legitimate interest to do so.
- If you instruct us to provide services, we will use the information you provide to carry out our contractual obligations to you and to fulfil any legal obligations arising from your instructions. We may also use it to notify you about changes in our organisation on the basis that this is compatible with our original use of your information.
- We will use any third-party personal data collected in the course of providing services to carry out our contractual obligations to our customers and to fulfil any legal obligations arising from such instructions.
- We may contact you on occasion with information if you are a customer or contact of the company
  or a person who we reasonably believe would be interested in receiving that particular
  communication. Any such communications are tailored and considered and are sent on the basis
  that we have a legitimate interest in doing so.
- If you ask to be added to our marketing database, we will use the information you provide to send you information about our organisation and services in accordance with your stated preferences. Any information obtained via the tracking of marketing emails is used to refine future email campaigns and supply you with more relevant content based around their activity. We will do this on the basis that you have consented to us processing your personal information in this way. You can stop receiving marketing information from us at any time as these communications provide easy ways to unsubscribe or update your preferences.

We will not use your personal information for any purpose not explained in this privacy policy or the privacy notices that apply to candidates and staff members and within our terms and conditions of business.

## Where do we store your personal information and how it is kept secure?

Some of the information you provide to us will be transmitted electronically, e.g. information provided via our website or by email. We would remind you that information transmitted via the internet is not completely secure and although we will do our best to protect any information transmitted in this way, we cannot guarantee its complete security.

Safeguarding your personal data is a top priority for us. We employ a multi-layered approach to security, designed to protect your information from unauthorized access, loss, alteration, or disclosure.

## Our security measures include:

- **Robust technical safeguards**: We utilize state-of-the-art security technologies, including firewalls and the advanced SentinelOne endpoint protection platform, to defend against cyber threats and unauthorized access.
- Stringent access controls: Access to your date is strictly controlled, adhering to industry best practices for password management and authorization.
- Secure data storage: Your personal data is stored on Microsoft Azure servers located within the UK, a facility that maintains 24/7 physical security and restricted access protocols.

We are committed to processing your data within the European Economic Area (EEA). However, in limited circumstances where required by law or to fulfil contractual obligations, we may transfer your data outside the EEA. In such cases, we ensure appropriate safeguards are in place to protect your information.

For detailed information on how we process and protect your data, please refer to our comprehensive policy portfolio, Data Handling, Information Security and Information Classification, all available on request.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

#### Who do we share your personal information with?

We may disclose your personal information to third parties if we are under a duty to disclose or share it in order to comply with any legal obligation (for example our auditors, our insurers, professional advisers and HMRC) or with your consent.

We may transfer limited amounts of your personal data to other companies within the Business Moves corporate group (including Business Moves Limited) to enable us to fulfil our contract with you and/or in our legitimate interests as part of leadership reporting.

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

We will keep your personal information for the following periods of time, subject to our email data retention policy:

Circumstances in which personal information was provided	How long do we keep it?
Information submitted via website form (that does not lead to an instruction)	Upon Instruction
Contact by any other means (e.g. email or telephone) which does not lead to an instruction	Upon Instruction

In the course of providing services	Usually 7 years from the conclusion of the instruction unless we inform you otherwise

#### Your rights in relation to the personal information we hold

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

## Contacting us

If you would like to communicate with us about any of the rights mentioned above, or if you have any other queries about the matters mentioned in this privacy policy, please contact us using one of the following options:

- Website: <u>www.businessmoves.com</u>
- Mail: <u>Iwheatley@businessmoves.com</u>
- Post: 4 Acre Road, Reading, RG2 0SX
- Phone: 0118 933 6600

# Complaints

You have the right to complain to the Information Commissioner about the way in which we collect and use your personal data: <u>www.ico.org.uk/concerns</u> or telephone 0303 123 1113.

## Changes to this privacy policy

This policy is effective from 25 May 2018. We may change this privacy policy from time to time by updating this webpage.

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Rachel Houghton, Man.Director

Linda Wheatley, Compliance Director

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