

# Privacy Policy

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CSXL Limited are committed to protecting and respecting your privacy.

**For the purposes of data protection legislation in force from time to time the data controller is CSXL Limited, 3 Redman Court, Princes Risborough, Buckinghamshire HP27 0AA**

We are a Management Consultancy specialising in Process and Technology Change and related services (our business). We collect some personal data for the following types of people to allow us to run our business (the data collected depends on the role); "You" in the following should be understood to refer to one or more of the groups listed below:

- Employees and Associates;
- Prospective employees and Associates;
- Prospective, current or past clients.
- Visitors to our website.

## **Information that you share with us**

We may collect personally-identifiable information when you visit our website or correspond with us by phone, e-mail or otherwise.

The personally-identifiable information collected may consist of information that you provide, such as your name, mailing address, e-mail address, and telephone number. For recruiting purposes, the information collected may include any other personally-identifiable information that you include on your resume or Curriculum Vitae including links to your professional profiles available in the public domain, for example LinkedIn, Twitter, business Facebook or other websites.

In addition, we may collect certain information that you do not visibly enter, such as your IP address, browsing pattern on the website, click stream data, HTTP protocol elements, and the status of cookies placed on your computer by us.

## **How might we use your personally-identifiable information?**

CSXL uses your personally-identifiable information to fulfil your requests for information, to evaluate any job applications or other employment-related inquiries that you may submit, and for such other purposes as you may initiate

or request. We may keep any of your personally-identifiable information on file and use it to contact you for recruiting purposes.

CSXL may also use personally-identifiable information to perform standard statistical analyses of user behaviour in order to measure interest in our website. If you visit our website, we may use personally-identifiable information collected from cookies and IP addresses as described below.

### **How do we use cookies?**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. We may also use cookies to process any subscription requests that you make with us.

### **What is the legal basis for processing of personal data?**

Our legal basis for the processing of personal data is our legitimate business interests, although we may also rely on contract and legal obligation.

We will rely on a contract if we are negotiating or have entered into an agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.

We will rely on legal obligation if we are legally required to hold information on to you to fulfil our legal obligations.

### **What other use might we make of your personal data?**

- Use of our website – to ensure that content from our site is presented in the most effective manner for you and for your computer.

### **We will use this information:**

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in any interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of our communications with you;

- to make suggestions and recommendations to you and other users of our site about services that may interest you or them.

### **Registration, alerts and Newsletters**

By signing up for any of our newsletters or alerts, you agree to receive on occasion other correspondence from CSXL or its agents. This type of information may be shared externally but only in anonymous and aggregated form for general user analysis.

We may ask for your e-mail address at registration. We will send e-mail to this address to confirm your registration, if you opt in to any of our newsletters or alerts, and if you request that we contact you for any other reason. If you sign up to receive any of our newsletters, you may on occasion receive other correspondence from CSXL. Your e-mail address will not be shared with any third party other than an agent who has agreed to send e-mails on our behalf.

### **Website usage consent**

By using our website, you consent to the collection, use, and storage of your information by us in the manner described in this Privacy Policy and elsewhere on the website. We reserve the right to make changes to this Privacy Policy from time to time.

### **Links to Third-Party Sites**

CSXL may provide links to third-party websites or information as a service to our users. If you use these links, you will leave our website. Such links do not constitute or imply an endorsement, sponsorship, or recommendation by CSXL of the third party, the third party web site, or the information contained therein, and CSXL shall not be responsible or liable for your use thereof. Such use shall be subject to the terms of use and privacy policies applicable to those sites.

### **Personal Data Disclosure**

- We may share some employee personal information with clients, business partners, suppliers and sub-contractors in connection with any contract we enter into with them.

Selected third parties includes:

- payment and other financial service providers;
- credit reference agencies, our insurance broker, compliance partners and other sub-contractors for the purpose of assessing an associate's suitability

for a role where this is a condition of us entering into a contract with a client;

- Our banks, finance providers, insurance company and auditors for the purpose of meeting our legal obligations;

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If CSXL Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of CSXL Limited, our customers, or others.

### **Our storage and processing of Personal Data**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). CSXL Limited will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

All information you provide to us is stored on our storage provider's secure servers. Any payment transactions will be encrypted using SSL, equivalent or successor technology.

Although the secure transmission of information via the internet is not guaranteed we will do our best to protect your personal data, and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

CSXL Limited has implemented generally accepted standards of technology and operational security in order to protect personally-identifiable information from loss, misuse, alteration, or destruction. Only authorized CSXL personnel and third party vendors are provided access to personally-identifiable information, and these employees and vendors are required to treat this information as confidential.

## Data Retention

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate business interests and that you are happy for us to do so.

We may archive part or all of your personal data or retain it on our financial systems only, deleting all or part of it from our main Customer Relationship Manager (CRM) systems. We will remove your data following a request for suppression or deletion of your data, and ensure that we do not re-enter your personal data on to our database, unless requested to do so.

## Your Rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes and we will collect express consent from you if required prior to using your personal data for marketing purposes. You can exercise your right to accept or prevent such processing by contacting us in writing or by telephone.

### GDPR allows you to:

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party in certain formats, if practicable.

- **Make a complaint** to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: <https://ico.org.uk/concerns/>

### **Access to information**

The Data Protection Act 1998 and the GDPR give you the right to access information held about you. We encourage you to contact us to ensure your data is accurate and complete. Your right of access can be exercised in accordance with the Act and the GDPR. A subject access request should be submitted to [info@csaccelerate.com](mailto:info@csaccelerate.com)

### **CONTACT**

Questions, comments and requests regarding this Privacy Policy should be addressed to [info@csaccelerate.com](mailto:info@csaccelerate.com)