Field Enablement customer privacy notice

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- · What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- Sharing information outside the UK
- How to complain

Contact details

Email

info@fieldenablement.com

What information we collect, use, and why

We collect or use the following information to **provide and improve products and services for clients**:

- · Names and contact details
- Addresses
- Pronoun preferences
- Occupation
- Payment details (including card or bank information for transfers and direct debits)

- Transaction data (including details about payments to and from you and details of products and services you have purchased)
- Usage data (including information about how you interact with and use our website, products and services)
- Information relating to compliments or complaints
- Video recordings
- Audio recordings (eg calls)
- Records of meetings and decisions
- Account access information
- Website user information

We collect or use the following personal information for the **operation of** client or customer accounts:

- Names and contact details
- Addresses
- Purchase or service history
- Account information, including registration details
- Information used for security purposes
- Marketing preferences
- Technical data, including information about browser and operating systems

We collect or use the following personal information for **information updates or marketing purposes**:

- Names and contact details
- Addresses
- Profile information

- Marketing preferences
- Purchase or account history
- Website and app user journey information
- IP addresses

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Address
- Payment details
- Account information
- Purchase or service history
- Call recordings
- Customer or client accounts and records
- Financial transaction information
- Correspondence

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

• Your right of access - You have the right to ask us for copies of your personal information. You can request other information such

as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. You can read more about this right here.

- Your right to rectification You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. You can read more about this right here.
- Your right to erasure You have the right to ask us to delete your personal information. You can read more about this right here.
- Your right to restriction of processing You have the right to ask us to limit how we can use your personal information. You can read more about this right here.
- Your right to object to processing You have the right to object to the processing of your personal data. You can read more about this right here.
- Your right to data portability You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. You can read more about this right here.
- Your right to withdraw consent When we use consent as our lawful basis you have the right to withdraw your consent at any time. You can read more about this right here.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide** and improve products and services for clients are:

 Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Collection of business contact details in order to be able to propose services of benefit to the business

Our lawful bases for collecting or using personal information for the **operation of client or customer accounts** are:

 Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Our lawful bases for collecting or using personal information for **information updates or marketing purposes** are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Collection of business contact details in order to be able to propose services of benefit to the business

Our lawful bases for collecting or using personal information for **dealing** with queries, complaints or claims are:

 Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Where we get personal information from

- Directly from you
- Publicly available sources

How long we keep information

We retain personal information for the period necessary

- To provide requested services
- To comply with legal obligations
- As agreed in individual consent
- To fulfil the responsibilities described in this Privacy Policy

In general, personal information will be removed after two years from the last business interaction, however retention periods can vary as we discharge the responsibilities described.

Who we share information with

Data processors

Microsoft Corporation

This data processor does the following activities for us: Provider of IT services

Hubspot, Inc

This data processor does the following activities for us: Provider of IT services

Others we share personal information with

• Professional or legal advisors

Regulatory authorities

• Organisations we're legally obliged to share personal information

with

• Professional consultants

Sharing information outside the UK

Where necessary, we may transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure

appropriate safeguards are in place.

For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us using the contact

information provided above.

Organisation name: Microsoft Corporation

Category of recipient: IT Service Provider

Country the personal information is sent to: United States

How the transfer complies with UK data protection law: The

International Data Transfer Agreement (IDTA)

Organisation name: Hubspot, Inc

Category of recipient: IT Service Provider

Country the personal information is sent to: United States

How the transfer complies with UK data protection law: The

International Data Transfer Agreement (IDTA)

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint

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