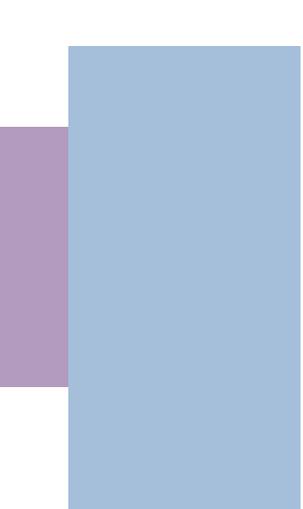


PRIVACY POLICY

JANUARY 2022



INTRODUCTION

The Clarity Practice Group Limited, trading as 'The Clarity Practice' respects the privacy of individuals and their organisations and is committed to protecting your personal data and commercially confidential data.

This privacy policy sets out how we look after your personal data when you visit our website (regardless of where you visit it from) and when we communicate with you directly through professional dealings or for any other purpose. It tells you about your privacy rights and how the law in the UK protects you.

PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information about how The Clarity Practice collects and processes your personal data, including any data you may provide to us.

It is important that you read this privacy policy so that you are fully aware of why and how we use your data. This privacy policy supplements our policies and notices provided to clients and our suppliers through our commercial contracts and agreements and is not intended to override them.

COMPLIANCE WITH UK LAW

The Clarity Practice privacy policy is compliant with relevant UK Laws and in particular it is designed to be conformant with the principles and guidance set out in the European laws on data protection as set out General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018.

CONTROLLER

This privacy policy is issued on behalf of the The Clarity Practice Group Limited; where there is a mention to "The Clarity Practice", "Clarity", "Company", "we", "us" or "our" in this privacy policy, it is referring to The Clarity Practice Group Limited and the Directors and staff responsible for processing your data. The Clarity Practice Group Limited is the "data controller" and is responsible for your personal data.

A Company Director is appointed who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

The Clarity Practice Group Limited
Gareth Dellenty, Managing Partner

garethd@theclaritypractice.co.uk
Lewis Building, Bull Street, Birmingham B4 6AF

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so would request that you contact us in the first instance.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 26th January 2022

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

DISCLAIMER - THIRD-PARTY LINKS ON OUR WEBSITE

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for the content on their websites or their privacy statements.

THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

Identity Data includes first name, maiden name, last name, username or similar identifier. We do not request or store data regarding marital status, title, date of birth and gender.

Contact Data includes normal office address or place of work, billing address, delivery address, email address and telephone numbers.

Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.

Profile Data is applicable for our website activity only and includes your username and password (where applicable), your interests, preferences, feedback and survey responses.

Usage Data applies to our website activity only and includes information about how you use our website, products and services.

Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. We may however be required to provide DBS check certificates (that are obtained by you) at the request of our Clients. In the event that these are required we will store these as part of your Identity Data records.

HOW IS PERSONAL DATA COLLECTED?

We use different ways to collect data from and about you including through:

DIRECT INTERACTIONS

You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post,

phone, email or otherwise. This includes personal data you provide when you apply for our products or services and when you enter into any kind of Contract with us as a Client or as a Supplier including when you;

- correspond directly with us and share documents and communications relating to Contracts and the delivery of Services;
- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- give us feedback.

AUTOMATED TECHNOLOGIES OR INTERACTIONS ON OUR WEBSITE

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

THIRD PARTIES OR PUBLICLY AVAILABLE SOURCES

We may receive personal data about you from various third parties and public sources as follows:

- Analytics providers, such as Google, based outside the EU;
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register.

HOW WE USE PERSONAL DATA

We will use personal data in the following circumstances:

- Where it is necessary for our legitimate interests (or those of a third party) where your interests and fundamental rights do not override those interests;
- Where we need to comply with a legal or regulatory obligation.

We do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by clicking the unsubscribe link in our email communications or by contacting us at info@theclaritypractice.co.uk.

NEXT REVIEW OF THIS POLICY

This policy is next due for review in January 2023.