

# Productle Ltd Privacy Statement and Cookies Policy

Policy reviewed and approved by Azadi Sheridan 30th May 2022

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### 1 Introduction

Productle Ltd is committed to ensuring that your privacy is protected and that we comply with all relevant data protection legislation, including the EU General Data Protection Regulation 2016/679 (GDPR) and the Data Protection Act 2018. This Privacy Statement and Cookies Policy explains how we use the information we collect about you and the procedures we have in place to safeguard your privacy.

Productle Ltd is registered with the Information Commissioner's Office (ICO), registration number ZA601943 and is a company registered in England and Wales (company number 9114283). For more information about how Productle Ltd uses personal data contact us via help@productle.com.

# 2 How we use your information

#### 2.1 Visitors to our website

When you visit our website at <a href="www.productle.com">www.productle.com</a> we use the third-party service Google Analytics to collect standard web log data and details of visitor use patterns. This gives us a range of summary analytical information but does not provide any personally identifiable information. We do not in any way try to identify the personal identities of visitors to our website.

You can find out more about how our website uses cookies from our cookies policy in <u>section</u> 5 below ('Use of cookies on this website').

Our website is hosted in the EU by Squarespace. Squarespace does not hold any personal information other than that relating to our staff and associates and as may be temporarily necessary to process any information you might submit via the 'contact us' form. If you leave our site via a link or otherwise, you will be subject to the policy of the provider of the destination website. We have no control over the data protection policies or terms of third party websites and so you should check their policies before using their websites.

#### 2.2 Visitors to our offices

If you visit our offices at The Grange,  $5^{th}$  Floor, 100 High Street, London, N14 6BN, we might provide your name to the reception before you arrive, so that they can welcome you and sign you into the building. The  $5^{th}$  Floor (including reception) is managed by Regus. They will only retain this information for the day of your visit.

#### 2.3 People who submit a query via our website

When you provide information to us via the 'contact us' form on our website, your query is automatically emailed to us and then immediately deleted from the website.

Your contact details are then stored on our internal customer relationship management (CRM) system. We will respond to your query as soon as possible and the retention period for your personal data will depend on the extent of your query.

We will keep your information secure and will retain it only for as long as is necessary to fulfil the purpose for which it was collected. We will not sell or exchange it with any other organisation, and we not share it with any other organisation unless:

- You explicitly ask us to;
- It is necessary to deliver information that you have requested from us; or
- It is necessary to facilitate our conferences or events that you have registered for.



#### 2.4 Clients and potential clients

We keep personal data relating to our key contacts at any organisation that expresses an interest in commissioning Productle Ltd to carry out an engagement. These details are kept on our CRM system. We endeavour to keep contact information up to date and we retain personal contact information for five years after the last active engagement.

Sometimes during an engagement we might need access to personal data you hold as a Data Controller, in order to help us deliver the engagement itself (e.g. as sample datasets or documents identifying people not employed by your organisation). In those instances, we are likely to be a third-party data processor. Any personally-identifiable data you provide under such circumstances will be treated with the utmost confidentiality and will only be used for the specific needs of the engagement. We will not share the data with any other third parties without your explicit consent.

#### 2.5 Job applicants, former employees and Associate consultants

We generally manage recruitment internally and do not share any data with third parties. Where a recruiter or recruitment platform is used, you are informed of their respective privacy policies when sharing data with them. We retain data relating to unsuccessful applicants for up to a year, whereupon we delete most of the information. We retain the name of all applicants for no more than five years.

Information about former employees is retained only for as long as we have a relevant, legitimate purpose for doing so.

Productle Ltd also works with associates who are independent contractors that work for us from time to time when we need to make use of their specialist skills. We hold personal data relating to our associates for the duration of our work with them plus a further six years. All Associates sign GDPR compliant contracts with Productle before doing any work with us and handle any personal data with the same rigour and transparency as our own partners and staff.

#### 2.6 Suppliers

If we have an obligation to pay you (e.g. following delivery of services) we will collect personal data from you to enable us to complete the transaction. We will store the data in our CRM system. We use online banking to make supplier payments. We retain supplier details for up to seven years from the date of the last transaction with them.

# 3 Your rights

#### 3.1 Access to personal information

Productle tries to be as open as it can be in terms of giving people access to their personal information. You have a right to ask us to stop processing your personal information and a right to ask for a copy of any information that we hold about you. You can read more about your rights here – <a href="https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/">https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/</a>

If we do hold information about you we will:

- give you a description of it:
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.



You can also ask us at any time to correct any mistakes there may be in the data we hold about you.

To make a request to Productle for any personal information we may hold about you, please put the request in writing addressing it to <a href="help@productle.com">help@productle.com</a>.

## 3.2 Regulatory Requirements

We may also share data with regulatory bodies and our external advisors should this be necessary for our legitimate business purposes or help us fulfil statutory or regulatory requirements.

# 4 Data Security

Productle takes the security of the data we hold very seriously. All staff use encrypted devices and two-factor authentication for additional security.

We take great care to minimise the risks of a data breach. If in the unlikely event we ever experience a significant data breach, we would inform data subjects as appropriate and would notify the ICO within the statutory 72 hour limit if applicable.

## 5 Use of cookies on this website

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. The cookies we use are the minimum required by our website provider Squarespace. Further details are available at <a href="this Squarespace Help">this Squarespace Help</a> Center article.

## 5.1 Where to find information about controlling cookies

- Internet Explorer cookies information
- Chrome cookies information
- Firefox cookies information
- Safari cookies information
- Opera cookies information
- Microsoft Edge cookies information

#### 5.2 Useful information

 A number of websites provide detailed information on cookies, including <u>AboutCookies.org</u> and <u>AllAboutCookies.org</u>.

