



## **Legal Information & Privacy**

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[GDPR: DATA PRIVACY NOTICE FOR CLIENTS, CONSULTANTS AND SUPPLIERS](#)

### **Introduction**

**Cyril Leonard** is committed to protecting and respecting your privacy.

This policy (together with standard terms and conditions and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation 2018 (the "GDPR").

#### **1. Definitions**

- Data controller** – A controller determines the purposes and means of processing personal data.
- Data processor** – A processor is responsible for processing personal data on behalf of a controller.
- Data subject** – Natural person

#### **Categories of data: Personal data and special categories of personal data**

**Personal data** – The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

**Special categories personal data** – The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

**Processing** – means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Third party** – means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

#### **2. Who are we?**

**Cyril Leonard** is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are:

Office Manager, 22 Gilbert Street, London W1K 5EJ  
Email: [gdpr@cyrilleonard.co.uk](mailto:gdpr@cyrilleonard.co.uk) Tel: 020 7408 2222.



### 3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

- To deliver the services you have asked us to provide to you in relation to any project
- To maintain contact and communication with you during the course of a potential or new project.
- To maintain contact in a professional capacity within the fields of instructions or services.
- To maintain our own records and accounts.
- To inform you of news, events or activities.
- To purchase goods, materials and services from you.
- To use Third Parties to provide services connected to the potential or new project

### 4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- Personal data may include your name, address, email address, phone number, financial data for payments such as VAT registration and bank details.

We have obtained your personal data from you, your employees or from publicly available data from websites.

### 5. What is our legal basis for processing your personal data?

#### a. Personal data (article 6 of GDPR)

**Our lawful basis for processing your general personal data:**

Consent of the data subject:

- Data for communications, marketing purposes and for sending out satisfaction surveys.
- Performance of a contract with the data subject:
- Running the business
- Scoping potential services/ projects
- To provide all services under the applicable contract with you
- To instruct any Third Party in relation to the potential projects and/ or to assist in the delivery of the services/ project you have asked us to deliver

Legitimate interest:

- Maintaining contact in a professional capacity within the fields of instructions or services
- Data used for the purposes of purchasing supplies, materials and third party services for the legitimate running of the business
- Data held for commercial and historical interest

#### b. Special categories of personal data (article 9 of GDPR)

**Our lawful basis for processing your special categories of data:**

- N/A

### 6. Sharing your personal data

Your personal data will be treated as strictly confidential and will be shared only with our staff. Data may also be shared with Third Parties who are instructed by us to assist in delivering services you have instructed us to provide.

We keep your personal data for no longer than reasonably necessary. Examples include: in case of any legal claims/ complaints, accounting etc., for example for accounting purposes we must keep records for 12 years or longer from the end of the last company financial year they relate to. In some cases there is a need to retain project data for over the 12 year period for commercial and historical interest.

### 7. Providing us with your personal data

You are under no statutory or contractual requirement or obligation to provide us with your personal data, but failure to do so may have consequences in relation to the services that we can offer or communications.



## 8. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, WHERE CONSENT WAS OUR LAWFUL BASIS FOR PROCESSING THE DATA;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller (known as the right to data portability), (where applicable, i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

## 9. Transfer of Data Abroad

We do not generally transfer personal data outside the EEA, unless on instruction by instruction basis the client or main supplier is a company based outside the EEA, in which case project team contact details may be shared with them for communication purposes only. Some of these entities may be located in countries that do not provide an equivalent level of protection as the EEA. Where required to transfer, we will implement appropriate cross-border transfer solutions to provide adequate protection for transfers of certain information.

## 10. Automated Decision Making

WE DO NOT USE ANY FORM OF AUTOMATED DECISION MAKING IN OUR BUSINESS.

## 11. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

## 12. Cookies

We do not use "cookies" or other such data capture devices on our website.

## 13. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check the website periodically to see any updates or changes to our privacy policy.

## 14. How to make a complaint

To exercise all relevant rights, queries or complaints, please in the first instance contact the Office Manager at the contact details above.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](#) on [03031231113](tel:03031231113) or via email at the link here <https://ico.org.uk/global/contact-us/email/>; or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.

Cyril Leonard, May 2018

### **COMPANY INFORMATION**

Cyril Leonard is the trading name of Cyril Leonard Ltd.

Registered address:

22 Gilbert Street

London

W1K 5EJ

Registered in England, number [9684779](#)