

Cairneagle Privacy Policy

Updated 21 May 2018

About Cairneagle and This Policy

Cairneagle is a strategy consulting firm based in London. We take your privacy seriously and are committed to protecting it.

This policy lays out how we collect your information, how we use it, and the rights you have relating to it. The information we collect and how we use it depends on our relationship to you, and we always attempt to minimise the information we collect.

If you have any questions about this policy, please don't hesitate to contact us – details are under 'Contact' below.

This policy may be updated from time to time, and we may also provide you with more specific information depending on your relation to us or our use of your information.

How We Collect Your Personal Information

We may collect your personal information in the following ways:

- You may provide it to us, for example through our website, in correspondence with us, or at meetings or events
- It may be provided to us through our clients and suppliers, where you are or may be their customer or employee
- You may participate in research that we are conducting, by completing a survey or agreeing to a telephone interview

If you choose not to provide this information, you may not be able to communicate with us, participate in research that we are conducting, comply with contractual obligations that you or the company you work for are under, or allow us to comply with contractual obligations that we may have, for example to an organisation that employs you or provides you with services.

Information We May Collect About You

We may collect technical and personal information when you interact with us electronically, for example through our website or by email. This includes browser and operating system type and version, website traffic and access data and logs, location data, time zones, email and IP (Internet Protocol) addresses. We may also collect information contained in any profile which you have created or stored and made accessible in the systems used for these communications, such as third party social networks. Much of this information will be collected automatically and some of it may be stored in 'cookies'. For more information about 'cookies' please refer to our separate policy.

We may collect personal information about you from our clients and suppliers. We will always aim to limit this information to the minimum necessary for the reason we are collecting it, and to avoid collecting information unnecessarily. The information we collect about you may include:

- identity, contact and correspondence information
- biographical information such as your age, education and employment
- information on your actions and activities, such as use of our clients' or suppliers' services, your preferences and approach regarding selection of those services, and your participation in the relevant markets
- your opinions on services provided or contemplated by our clients, or available in markets we are researching, and on trends and issues in those markets

How We Use Your Personal Information

The lawful basis for most of our use of your information is our legitimate interests, with the specific exception permitted for B2B marketing under the UK PECR. We may collect, aggregate, combine, store, retrieve, analyse and transmit your information only in ways which are necessary to:

- communicate with you and ensure our communications are relevant, accurate, and in accordance with your rights and preferences
- understand the markets in which we and our clients operate, including trends, issues and opinions, improve our products and services, and to notify clients and other market participants of changes to them
- promote our services and business to our clients, prospects, and the wider community and markets in which we operate
- support our current and prospective clients through research and analysis, project management, execution and implementation
- recruit and manage our staff effectively, identifying and communicating with candidates, administering applications and employment, and sharing market information and opportunities with advisors, alumni and associates
- operate the administrative and technical functions of our business, for example making and receiving payments to third parties
- fulfil our legal and contractual obligations, including your rights and those of others regarding information that we collect

We do not use your information for automated decision-making.

In some cases we may use and process your personal information based on your consent for us to do so. In these cases you may withdraw your consent for us to use your information at any time. Please see **Your Rights** below for further details.

Sharing Your Information

We may also share your information with other individuals or organisations who provide services to us, or to you on our behalf. We only share the information that is necessary for the provision of the service, and this is subject to an agreement which commits the provider to keeping your information secure and using it for the intended purpose(s).

- Professional services such as accountancy providers and law firms
- Financial services such as banks and payment networks
- Technology providers such as cloud storage and software-as-a-service (SAAS)

We may also share your information

- with government agencies, such as HMRC, in order to fulfil our obligations to them, for example in administering payroll and taxes.
- to comply with or enforce any other legal or contractual obligation, to assist with legal or criminal investigations, or to detect or report fraud or other crime, or for reasons of health and safety.

Where We Store Your Personal Information

We store our information in the UK or in the EU. We do not transfer any data to third countries. However from time to time our staff may access our data from outside the EU, in which case we will apply appropriate security controls to ensure the continued protection of your personal data.

Retention Of Your Personal Information

We do not retain personal information for longer than is necessary. The time we retain it is determined by a number of factors, including

- our need to respond to requests
- our legal and contractual obligations
- our policy to minimise retention of personal information

Security and Links To Other Sites

We put appropriate technical and organisational measures in place to keep your personal information safe. However, transmission of data via internet cannot be guaranteed to be secure, and so transmission to and from our systems, including our website, is at your own risk. Once we have received your information, our policies, procedures and systems are designed to protect it from loss, corruption or unauthorised access, and to ensure its accuracy and availability.

Our website, communications, reports, other work products and communications may contain links to websites or systems run by other organisations. This policy does not apply to them, and your use of them is subject to their policies and measures, over which we have no control. We recommend that you check them, and we are not responsible for them even if you access them via links or materials we provide.

Cookies

Like most others, our website uses cookies (for example, Google Analytics cookies) to obtain an overall view of user activity and to deliver some functionality such as recognising you when you return to the site and tailoring your experience. 'Cookies' are small pieces of information sent to your computer or device and stored on its hard drive to allow our websites to recognise you when you visit. It is possible to switch off cookies by setting your browser preferences. For more information on how we use cookies and how to switch them off on your device, please visit our Cookies Policy.

Your Rights

Under data protection law, you have the right to:

- ask for a copy of any of your personal information that we hold
- update or correct any information that we hold on you
- ask us to stop using your personal information
- ask us to remove or erase your personal information

In addition, if our use of your information is based on your specific consent, you also have the right to request a copy of your data in a machine-readable format such as CSV (Comma-Separated Values).

If you wish to exercise any of these rights, please contact us using any of the methods listed below under **'Contact'**. We may need to request further information from you to action your request, including information required to identify you, and we will take reasonable measures to comply with your request lawfully and promptly. We will always honour a request not to contact you for marketing or promotional purposes.

We may not provide you with a copy of your personal information, or it may be redacted, if this concerns other individuals or we have another lawful reason to withhold the information. In some situations we may have a legal obligation or right to continue using your information despite your request. Asking us to stop using or erase your information will not affect any use we have made of it up to that point.

How To Contact Us

You can contact us with any queries about this policy by post, email or telephone.

Our email address is info@cairneagle.com, or you can use our website's Contact Us form.

If you would prefer to speak by phone, please call 020 7036 9400.

Cairneagle Associates LLP