



Napier House, 24 High Holborn, London WC1V 6AZ
www.wttconsulting.co.uk

Privacy Notice for WTT Consulting Limited

This privacy policy applies when you visit or use our website, wttconsulting.co.uk ("Site"), mobile application ("App") and other services, including events, that refer or link to this privacy policy (each, a "WTT Service").

This privacy policy may be supplemented by additional privacy statements, terms or notices provided on certain areas of the WTT Service or during our interactions with you.

Who we are

The data controller who is responsible for your personal data is WTT Consulting Limited, a company incorporated in England and Wales with registered company number 09510847 and registered offices located at Napier House, 24 High Holborn, London, United Kingdom, WC1V 6AZ ("the Co-operative", "we", "our" or "us").

We are registered with the Information Commissioner's Office.

Our principles of data protection

Your privacy is important to us. Our aim is only to collect and use your personal data for the purpose of providing the WTT Service.

We will only send you marketing communications with your prior consent and when we do, you will be provided with the option to either opt out of future communications or to change the way in which we communicate with you.

What personal data we collect

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed i.e. anonymous data.

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, marital status, title, date of birth and gender.
- **Sensitive Personal Data** includes physical or mental health details, racial or ethnic origin, religious or other beliefs of a similar nature, trade union membership, biometric data for the purposes of uniquely identifying an individual, government-issued identification numbers e.g. national insurance number and information about an individual's criminal offences or convictions.
- **Contact Data** includes current and former address(es), email address and telephone numbers, as well as information regarding your emergency contacts.
- **Background Data** includes your job title, department, job role, employment and education history.
- **Financial Data** includes bank account details and payment card details.
- **Payroll Data** includes personal and financial data relevant to processing employment payments to you.
- **Contract Data** includes contract rates, agency and/or end client contact information and contract terms.
- **Transaction Data** includes details about payments to and from you and other details of the Co-operative Service you have obtained from us and all transactions and matters that we have acted for you in.
- **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 Site or App.
- **Profile Data** includes files that we have for you, feedback and survey responses.
- **Usage Data** includes history of the files that we hold for you.



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How we collect your data

We collect personal information about you in three ways: directly from your input, through the WTT Service technologies, and from third party sources.

How we use your data

Depending on how you interact with us and the WTT Service and your preferences, we use your personal information to:

- Provide, activate and manage your access to and use of the WTT Service;
- Process and fulfil a request or other transaction (including to process payments);
- Provide technical, product and other support and to help keep the WTT Service working, safe and secure;
- Enhance and improve the WTT Service and to develop new products, services and benefits;
- Offer you customized content and other personalization to make the WTT Service more relevant to your interests and geography;
- Respond to your requests, inquiries, comments and concerns;
- Notify you about changes, updates or other announcements related to the WTT Service and our other products and services;
- Deliver targeted advertisements, promotional messages, notices and other information related to the WTT Service, your interests and other products, events and services;
- Invite you to participate in user testing and surveys as well as competitions and similar promotions;
- Identify usage trends and develop data analysis, including for purposes of research, audit, reporting and other business operations, including determining the effectiveness of our promotional campaigns and evaluating our business performance; and/or
- Comply with our legal obligations, resolve disputes, and enforce our agreements.

How we can share your data

We will disclose the data we collect from you to certain third parties who use your personal data to deliver their services to us.

We will send your personal data to the following sets of data processors in order to perform the WTT Service:

- **Fraud prevention agencies** - in order to verify your identity, protect against fraud, comply with anti-money laundering laws and to confirm your eligibility to use the WTT Service;
- **Cloud based storage providers** - to safely and securely store your data within WTT;
- **Cloud based application providers** - that help us provide the WTT Service;
- **Banking and financial services partners** - that help us provide the WTT Service;
- **Web analytics providers** - to evaluate the usage of the WTT Service

We may also disclose your personal information in the following circumstances:

- If the WTT or substantially all of its assets are acquired by a third party, in which case personal data held will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request.
- In order to:
 - a) enforce or apply any other agreements between you and us or to investigate potential breaches; or
 - b) protect the rights, property or safety of WTT, our employees or others.



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International data transfers, storage and security

The data that we collect from you will be transferred to and stored both inside and outside the European Economic Area (EEA) in order for us to provide the WTT Service.

We will take all steps to ensure that your data is treated securely and in accordance with this privacy policy.

Any payment transactions carried out by our chosen third-party provider of payment processing services will be encrypted using Secured Sockets Layer technology or a secure virtual private network.

Where we have given you (or where you have chosen) a password that enables you to access certain parts of our Site and/or our App, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site or App; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Data retention

We retain your personal information for as long as necessary to provide the WTT Service and fulfil the transactions you have requested, and for other essential purposes such as complying with our legal obligations, maintaining business and financial records, resolving disputes, maintaining security, detecting and preventing fraud and abuse, and enforcing our agreements.

Your legal rights

You have the right under European and certain other privacy and data protection laws to request free of charge:

- access to and correction or deletion of your personal information;
- that we cease or limit the processing of your personal information;
- a copy of your personal information (right to data portability); and to
- object at any time to processing of personal information concerning you for direct marketing.

If you would like to exercise any of these rights, please contact us at the address set out below. We will respond to your request consistent with applicable laws. To protect your privacy and security, we may require you to verify your identity.

How to contact us

If you have any questions, comments or requests regarding this privacy policy or our processing of your information, please contact:

Data Protection Officer: Mr Rhys Thomas

Full name of legal entity: WTT Consulting Limited

Postal address: Napier House, 24 High Holborn, London, United Kingdom, WC1V 6AZ

Email address: info@wttconsulting.co.uk

Telephone number: 020 3468 0000

Complaints

The safety of your personal data is important to us. In situations where you are not happy with how we have processed your personal data, 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 please do contact us in the first instance.



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Changes

We will update this privacy policy from time to time. Any changes will be posted on this page with an updated revision date. If we make any material changes, we will provide notice through the WTT Service or by other means.

Cookies Policy

WTT Consulting Limited ("us", "we", or "our") uses cookies on WTT Consulting Limited (the "Service"). By using the Service, you consent to the use of cookies.

Our Cookies Policy explains what cookies are, how we use cookies, how third-parties we may partner with may use cookies on the Service, your choices regarding cookies and further information about cookies.

What are cookies

Cookies are small pieces of text sent by your web browser by a website you visit. A cookie file is stored in your web browser and allows the Service or a third-party to recognize you and make your next visit easier and the Service more useful to you.

Cookies can be "persistent" or "session" cookies.

How WTT Consulting Limited uses cookies

When you use and access the Service, we may place a number of cookies files in your web browser.

We use cookies for the following purposes: to enable certain functions of the Service, to provide analytics, to store your preferences, to enable advertisements delivery, including behavioral advertising.

We use both session and persistent cookies on the Service and we use different types of cookies to run the Service:

Essential cookies. We may use essential cookies to authenticate users and prevent fraudulent use of user accounts.

Third-party cookies

In addition to our own cookies, we may also use various third-parties cookies to report usage statistics of the Service, deliver advertisements on and through the Service, and so on.

What are your choices regarding cookies

If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser.

Please note, however, that if you delete cookies or refuse to accept them, you might not be able to use all of the features we offer, you may not be able to store your preferences, and some of our pages might not display properly.

Where can you find more information about cookies

You can learn more about cookies and the following third-party websites:

AllAboutCookies: <http://www.allaboutcookies.org/>

Network Advertising Initiative: <http://www.networkadvertising.org/>

Last updated 24th May 2018