

## Privacy Policy Statement

Pick Everard is committed to ensuring that your privacy is protected in line with the General Data Protection Regulation (“GDPR”) and other legislative requirements. The word ‘YOU/YOUR’ is used frequently within this policy and refers to the individual for whom information may be requested, made available to etc.

This Privacy Policy sets out how Pick Everard uses and protects any information that you give Pick Everard when you contact us – in person, by telephone, text, email or via this website. However, we may also collect information:

- from publicly accessible sources, e.g. Companies House or HM Land Registry;
- directly from a third party, e.g. credit reference agencies;
- from a third party with your consent, e.g. client’s reference;
- from cookies on our website – see below for more information.

### What we collect

We may collect the following information:

- name and job title
- contact information including email address
- demographic information such as postcode, preferences and interests
- information to enable us undertake credit or other financial checks on you
- other information relevant to customer surveys, promotions and/or offers

We do not collect or process special category personal information (e.g. racial or ethnic origin, religious belief etc.) without your explicit consent.

### How and why we use your personal information

Under GDPR, we can only use your personal information if we have a proper reason for doing so, that is:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

### What we do with the information we gather

We use a third-party email service provider to enable us to keep in touch with you, so that we can:

- Improve our products and services.

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- Periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.
- From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone or mail. We may use the information to customise the website according to your interests.

We require this information for our legitimate interests – to understand your needs and provide you with a better service, and in particular to keep our internal records up to date. This means we do not usually need your consent to send you marketing and promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

### Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

### How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

### Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Privacy Policy. You should exercise caution and look at the privacy statement applicable to the website in question.

### Who we share your personal information with

We routinely share personal information with:

- Perfect Circle JV Ltd
- Scape Group and its affiliates
- third parties we use to help deliver our services to you, e.g. our sub-consultants and supply chain;
- other third parties we use to help us run our business, e.g. marketing agencies or website hosts;
- credit reference agencies;
- our insurers; and
- our bank.

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We only allow these service providers to handle your personal information if we are satisfied, they take appropriate measures to protect your personal information. The reasons for sharing your personal information are set above under the heading “How and why we use your personal information”.

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so.

### **How long your personal information will be kept**

We will keep your personal information while we are providing services to you. Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. When it is no longer necessary to retain your personal information, we will delete or anonymise it.

### **Your rights**

You have the following rights, which you can exercise free of charge:

**Access** - The right to be provided with a copy of your personal information (the right of access)

**Rectification** - The right to require us to correct any mistakes in your personal information

**To be forgotten** - The right to require us to delete your personal information – in certain situations

**Restriction of processing** - The right to require us to restrict processing of your personal information – in certain circumstances, e.g. if you contest the accuracy of the data

**Not to be subject to automated individual decision-making** - The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

**Data portability** - The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party – in certain situations

**To object** - The right to object:

- At any time to your personal information being processed for direct marketing (including profiling)
- In certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interest

Pick Everards ICO Registration Number is: Z5737794, Jersey Data Protection Registration Confirmation Number 67943

The Privacy Policy is available on our website. This Policy is monitored and reviewed annually to ensure its continued suitability and adequacy.

**Signed for the Partnership:**



**Duncan Green**  
Managing Partner