

# 1. Introduction

This privacy notice is issued on behalf of the members of This Partners LLP, so when we mention This Partners, "we", "us" or "our" in this privacy notice, we are referring to the member organisations of the LLP as well as the LLP itself. A list of members can be accessed on the UK government's Company House registry web site on <https://beta.companieshouse.gov.uk/company/OC392293>. This Partners LLP is the controller and responsible for this website.

This Partners LLP is firmly committed to privacy, the responsible use of information, the need to safeguard the privacy of our clients and visitors to our website, and to maintaining compliance with privacy legislation. This Partners will ensure that the data you supply to This Partners is processed fairly and lawfully, and with care. We take our responsibilities in respect of your personal data extremely seriously.

We process personal data in accordance with applicable legislation, including the General Data Protection Regulation (2016/679; the "GDPR") and other applicable national data protection laws in United Kingdom and Finland.

This statement sets out This Partners' privacy policy for the collection and processing of personal data through your use of our website, including any information you may provide through the website when you contact us for any reason such as:

- Subscription to newsletters and other marketing messages
- Recruitment processes
- Registering for an event or webinar
- Downloading content
- Filling in a survey.

This website is not intended for children and we do not knowingly collect data relating to children through this website.

It is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

We have appointed Andy Palfrey (one of our founders and our CEO) as our data privacy manager and he has responsibility for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights please send us an email at [info@thispartners.com](mailto:info@thispartners.com).

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

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](http://www.ico.org.uk)). We would, however, appreciate you contacting us in the first instance so can we assist you directly.

### **Third-party links**

This website may include links to third-party websites, plug-ins and applications as well as embedded content such as YouTube videos. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **2. The data we collect about you**

Personal data means any information which identifies an individual. It does not include data where identity information has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you as follows:

Contact Data	includes email address, phone number, postal address or other information included in Curriculum Vitae or as published on social networking sites (e.g. LinkedIn)
Identity Data	includes first name, last name, job title / employer, photo or other information included in Curriculum Vitae, other correspondence with us or as published on social networking sites (e.g. LinkedIn)
Marketing and Communications Data	includes your Contact Data for us to send marketing communications to you
Profile Data	includes your username and password for use of This Partners' IT systems

Technical Data	includes internet protocol (IP) address, 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 this website.
Usage Data	includes information about how you use our website
Other Information	any other information that you provide us that can be used to identify you, including financial information where for example we process a payment made by you.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. (Aggregated data may be derived from your personal data but is not considered personal data by law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.)

We only process Special Categories of Personal Data if you give us your explicit consent, the processing is necessary to meet a legal or regulatory obligation, or is otherwise expressly permitted by the GDPR. Special Categories of Personal Data includes information about your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, and data concerning health, sex life, and sexual orientation.

### 3. How is your personal data collected

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity and Contact Data by filling in forms or by corresponding with us on this website. This includes personal data you provide when you:
  - subscribe to our services, events or publications;
  - request marketing to be sent to you;
  - send us information about a request for proposal;
  - contact us in relation to a media, supplier or career enquiry;
  - apply for a role with This Partners; or
  - give us some feedback.

- Automated technologies or interactions. As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- Third parties or publicly available sources. We may receive personal data about you from analytics providers, news sources or if your employer (acting, for example, in their capacity as our client, supplier or industry service provider) supply such information to us.
- Social media, such as if you link to social media platforms or use social media plug-ins, we may (depending on your user privacy settings on that social media platform) receive information about you from that social media platform.

## 4. How we use your personal data and your rights

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we process personal data provided to us by or on behalf of our clients or suppliers for the purposes of the work we do with them or on their behalf.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- To match your details with work vacancies at This Partners, and to engage with you in relation to our resource planning processes.

You may at any time exercise your rights in relation to your personal data that we process:

- **Right to access and rectification:** You have the right to request access to the personal data relating to you. This includes e.g. the right to be informed whether or not personal data about you is being processed, what personal data is being processed, and the purpose of the processing. You also have the right to request that inaccurate or incomplete personal data be corrected.
- **Right to object:** You are entitled to object to certain processing of personal data, including for example processing of your personal data for marketing purposes or when we otherwise base our processing of you on a legitimate interest.
- **Right to erasure:** You may also request that your personal data be erased if e.g. the personal data is no longer necessary for the purposes for which it was collected, the processing is unlawful, or the personal data has to be erased to enable us to comply with a legal requirement.
- **Right to Data Portability:** If personal data about you that you yourself have provided is being processed automatically with your consent or in accordance with a contract between you and This Partners, you may request that the data is

provided in a structured, commonly used and machine-readable format and you may also request that the personal data is transmitted to another controller, if this is technically feasible.

- **Right to withdraw your consent:** In cases where the processing is based on your consent, you have the right to withdraw your consent to such processing at any time.
- **Opt-out from marketing:** We will give you the opportunity to opt out of future marketing when we send you marketing material. You can also opt out at any time by contacting us.

## 5. Why we use your personal data

In the table below, we have described all the ways we plan to use your personal data, and on what legal basis we rely on to do so. We have also identified what our legitimate interests are where appropriate. Generally, we do not rely on consent as a legal basis for processing your personal data.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To manage our relationship with you, which may include: (a) Telling you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Marketing and Communications (d) Profile (e) Other	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to be informed how clients use our services)
To enable you to complete a survey	(a) Identity (b) Contact	(a) Performance of a contract

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
	(c) Usage (d) Marketing and Communications (e) Profile	(b) Necessary for our legitimate interests (to study how clients use our services, to develop them and grow our business; to deliver our services to clients)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical (d) Profile (e) Usage (f) Other	(a) Necessary for our legitimate interests (for running our business, This Partners administration and IT services, network security, to prevent fraud and in the context of a business reorganisation) (b) Necessary to comply with a legal obligation
To develop and deliver relevant website content, sales and marketing communications and advertisements to you / your employer. To contact you following your making a request for further information from us via the website. To measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how clients use our services, to develop our services, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, services, marketing,	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of clients)

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
customer relationships and experiences		for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To enable you to apply for jobs at This Partners, to contact you in relation to a recruitment process, and to share your details internally with relevant hiring managers	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications (e) Technical (f) Profile	Necessary for our legitimate interests (to recruit applicants into roles at This Partners)
To keep your recruitment information on file (if you have asked us to do so) to contact you about future jobs at This Partners which match your profile and to contact you about This Partners jobs, services, news and other developments	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications (e) Technical (f) Profile	Necessary for our legitimate interests (to recruit applicants into roles at This Partners)
To conduct online media checks on candidates (as required by regulation in some jurisdictions) to determine if there is any information about you in the public domain that might affect your suitability for the applied role	(a) Identity (b) Contact (c) Profile (d) Other	(a) Necessary for our legitimate interests (to recruit applicants into roles at This Partners) (b) Necessary in order to comply with a legal obligation (due to the nature of This Partners’ business and the work we undertake for our clients)

Any other purposes for which we wish to use your Personal Data that are not listed above, or any other changes we propose to make to the existing purposes will be notified to you by amending this privacy policy.

## **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. If you no longer want to receive This Partners marketing communications, you can contact us.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you / your employer.

You will receive marketing communications from us if you:

- have requested information from us
- purchased services from us
- provided us with your contact details when we meet you at a This Partners event or other conference or meeting
- are in a position which we believe that could well be interested in our marketing communications

and, in each case, you have not opted out of receiving marketing communications from us.

## **Change of purpose**

We will only use your personal data for the purposes that we collected it for, unless we reasonably consider that we need to use it for another reason and such reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, contact us.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **6. Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table in section 4 above.



- Internal Third Parties Your personal data will be used by our partners, employees and other staff members for the purposes described above and for accounting, tax and other administrative purposes.
- External Third Parties We engage third-party service providers for the provision of services that help us in processing personal data and providing services to our clients. These will process your personal data as data processors solely on our behalf. The categories of such recipients include:
  - service providers for information technology and telecommunications (such as hosting providers and email service providers);
  - marketing service providers;
  - accounting service providers.
- Third Parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. We will not disclose any personal data you have given to us other than as described in this statement, unless you have authorized us to do so, or if we are required to do so by law. Please note that if at any time This Partners is required by law to release information about you, This Partners will do so and will co-operate fully with the relevant authorities.

## 7. Where is your data processed?

We primarily process personal data on servers within the UK/EU/EEA.

However, we may need to transfer your information from a location within the UK/EU/EEA. The level of information protection in countries outside the UK/EU/EEA may be lower than that offered within the EEA. Where this is the case, we will implement appropriate measures under the GDPR to ensure that your personal information remains protected and secure. Our international transfers of personal data are based on the EU Commission's standard contractual clauses. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)

## 8. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **9. Data retention**

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **10. Cookie policy**

What are 'cookies'?

'Cookies' are small text files that are stored by the browser on your computer or mobile phone. They are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

Websites can read from and write to these files, allowing them recognise user preferences or return visitors. Cookies are the tools that give websites a sense of memory, allowing them to recognize one user's website visit from another. For example, this site uses cookies to count the number of visitors to our site.

Each web domain can only access cookies stored by that specific web domain, meaning that only the paconsulting.com servers can access the cookies set by the paconsulting.com domain. These cookies are called first party cookies. Third party cookies are cookies set by third-party websites.

Note that cookies are not software, they are not programs, they cannot carry viruses and they cannot install any kind of malware on the host computer.

The data collected within these cookies are anonymised data based on IP addresses and do not contain any individual information.

### Use of cookies on this site

Some cookies used on thispartners.com are technically necessary for the web site to operate.

Other cookies enable us to remember visitors' preferences. We ask visitors to consent to these before they activate the "remember me" facility to access a secure area or participate to a poll.

We use other cookies for marketing and website optimisation. Some of them are analytical cookies and allow us to understand how our web site performs. We can count the number of visitors, know how effective our content is and improve how our web site works. We use this information anonymously for statistical purposes. Others can be combined with personal data visitors have consented to give to us so we can deliver marketing or advertising communications that are relevant to their interests.

Finally, some cookies are used by advertisers to deliver advertising material relevant to visitors' interests.

Please contact us if you want more information on how we use cookies.

<b>Cookie</b>	<b>Name</b>	<b>Purpose</b>
surfer, visit	surfer, visit	These cookies allow the website to identify distinct visitors to store items added to a basket or other form mechanism within a session
__utma, __utmb,	__utma, __utmb,	These cookies enable the function of Google Analytics. This helps us collect and analyse visitor information such as browser usage, new

<b>Cookie</b>	<b>Name</b>	<b>Purpose</b>
__utmc, __utmz, __utmv	__utmc, __utmz, __utmv	visitor numbers, response to marketing activity and browsing time on our website. That information helps us to improve the website and your browsing experience, and to make our marketing campaigns relevant.

We generally use the following types of cookies, which may change from time to time:

### **How to opt-out from cookies in your browser**

Most browsers allow you to change your cookie settings. These settings will typically be found in the 'options' menu of your browser. To understand these settings, [this link](#) may be helpful.

### **Useful links**

If you would like to find out more about cookies and their use on the Internet, you may find [this link](#) useful.