



# Privacy Notice

## How we use your personal information

This privacy notice is to let you know how Culture Chameleon (CC) promises to look after your personal information. This includes what you tell us about yourself, what we learn by having you as a client, and the choices you give us about what marketing you want us to send to you. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

## Our Privacy Promise

We promise:

- To keep your data safe and private;
- Not to sell your data;
- To give you ways to manage and review your marketing choices at any time.

## Who we are

Culture Chameleon is the trading name of Chameleon HR Ltd., an independent People and Culture consultancy. You can find out more about us at [www.culturechameleon.co.uk](http://www.culturechameleon.co.uk).

If you have any questions, or want more details about how we use your personal information, you can:

- Ask us using our [secure online contact form](#); or
- Call us on 07919 006868; or
- Write to us at 1 The Wenta Business Centre, Colne Way, Watford, Herts, WD24 7ND; or
- Email us at [info@culturechameleon.co.uk](mailto:info@culturechameleon.co.uk)

## How does the law protect you?

As well as our Privacy Promise, your privacy is protected by law. This section explains how that works. Data Protection law says that we're only allowed to use personal information if we have a proper reason to do so. This includes sharing it outside of CC. The law says we must have one or more of these reasons:

- To fulfil a contract that we have with you; or
- When it is our legal duty; or
- When it is in our legitimate interest; or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, this mustn't unfairly go against what is right and best for you. If we rely on our legitimate interest, we'll tell you what that is.

Here's a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

What we use your personal information for	Our Reasons	Our Legitimate Interests
<ul style="list-style-type: none"> <li>• The management, administration and operation of our business</li> </ul>	<ul style="list-style-type: none"> <li>• Contractual</li> <li>• Compliance with a legal obligation</li> <li>• Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>• Longer term retention to protect the business from legal action</li> <li>• Ongoing relationship with suppliers and clients</li> </ul>
<ul style="list-style-type: none"> <li>• Delivery of core services to clients</li> </ul>	<ul style="list-style-type: none"> <li>• Consent</li> <li>• Contractual</li> <li>• Compliance with a legal obligation</li> <li>• Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>• Longer term retention to protect the business from legal action</li> <li>• Ongoing relationship with suppliers and clients</li> </ul>
<ul style="list-style-type: none"> <li>• Direct and indirect marketing of CC to existing and potential clients</li> </ul>	<ul style="list-style-type: none"> <li>• Consent</li> <li>• Compliance with a legal obligation</li> <li>• Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>• Possibly needed for a suppression list</li> <li>• Ongoing relationship with clients</li> </ul>

What we use your personal information for	Our Reasons	Our Legitimate Interests
<ul style="list-style-type: none"> <li>The management of people who do, or have done work for CHR including Associates</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> <li>Contractual</li> <li>Compliance with a legal obligation</li> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>Due diligence</li> <li>Longer term retention to protect the business from legal action</li> <li>Possibly needed for a suppression list</li> </ul>

## Groups of Personal Information

Where relevant and for a specific purpose, we will typically use the following different kinds of personal information. If we do, we'll group them together like this:

Types of Personal Information	Description
Who you are	Your title, name, date of birth
Socio-demographic	Your interests, qualifications, job title, employment history, employee reference number, references
Your contact details	Your address, email address, social media handles, phone numbers
Documentary data	Your passport details, business insurance details, national insurance number, place of birth
Social relationships	Your next of kin
Financial	Your bank account details, salary,
Special types of data	The law and other regulations treat some types of personal information as special. We will only collect and use these types of data if the law allows us to do so: <ul style="list-style-type: none"> <li>Health data including gender</li> </ul>

If there is a need for CC to process other types of personal data, then we'll need to agree this before we're sent this data.

## Where we may collect personal information from

We may collect personal information about you, or your business, from you or from your employers if we're working directly for them:

- Emails and letters that you send to us;
- Meetings that we have with you;
- Over the telephone;
- Online, including through social media and online systems;
- Business cards that you give to us;
- Companies that introduce you to us;
- References;
- When you use our website;
- Agents working on our behalf;
- Medical practitioners\*.

\* In certain circumstances, we may ask your GP or other medical professional to send us a report. In line with the Access to Medical Reports Act 1988, we will only do this if we get your consent first. We recognise that this data is highly sensitive and we will therefore delete it from our systems as soon as we no longer need it to carry out our work.

## Who we share your personal information with

We may share your personal information with:

- Our Associates (e.g. other professionals working on behalf of Culture Chameleon, such as HR Consultants, Accountants, Administrators etc.);
- Organisations that introduce you to us, who may be our clients;
- Companies that we introduce you to (e.g. our clients, companies within our professional network etc.);
- Companies you ask us to share your data with (e.g. our clients, companies within our professional network, benefits or pension providers etc.).

During any such process, we may share your data with other parties. We'll only do this if they agree to keep your data safe and private.

## **Sending data outside of the EEA**

We'll only send your data outside of the European Economic Area ('EEA') to:

- Follow your instructions.
- Comply with a legal duty.

If we do transfer information outside of the EEA, we'll make sure that it's protected in the same way as if it was being used in the EEA. We'll use one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA;
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA;
- Transfer it to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the EEA.

You can find out more on the European Commission Justice website.

## **If you choose not to give personal information**

We may need to collect personal information by law, or under the terms of a contract we have with you or your employer.

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot provide the services that you have asked us to / we have been asked to by a client.

## **Marketing**

We may use your personal information to tell you about relevant services and offers. This is what we mean when we talk about 'marketing'.

The personal information we have for you is made up of what you tell us, and data we collect when you use our services, or from third parties we work with.

We study this 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.

We can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest' (e.g. if you're an existing client). That is when we have a business or commercial reason to use your information. This mustn't unfairly go against what's right and best for you.

You can ask us to stop sending you marketing messages by contacting us as outlined above under **Who we are** at any time.

We may ask you to confirm or update your choices from time to time. We'll also ask you to do this if there are changes in the law, regulation, or the structure of our business.

If you change your mind, you can update your choices at any time by contacting us as outlined above under **Who we are** at any time.

## **How long we keep your personal information**

We'll keep your personal information for as long as you work with CC / are employed by one of our clients.

After you stop working with CC / being employed by one of our clients, we may keep your data for one of these reasons:

- To respond to any questions or complaints;
- To show that we treated you fairly;
- To maintain records according to rules that apply to us.

If we can't delete your data legal, regulatory or technical reasons, we'll make sure that your privacy is protected.

### **How to get a copy of your personal information**

You can access your personal information by contacting us using any of the ways we've listed above in **Who we are**.

### **Letting us know if your personal information is incorrect**

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this. If you do, we'll take reasonable steps to check its accuracy and correct it.

### **Asking us to stop using your personal information**

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we shouldn't be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

You can ask us to restrict the use of your personal information if:

- It's not accurate;
- It's been used unlawfully, but you don't want us to delete it;
- It's not relevant any more, but you want us to keep it for use in legal claims;
- You've already asked us to stop using your data, but you're waiting for us to tell you if we are allowed to keep on using it.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it or, please contact us.

### **How to withdraw your consent**

You can withdraw your consent at any time. Please contact us if you want to do so.

If you withdraw your consent, we may not be able to provide certain services to you. If this is so, we'll tell you.

### **How to complain**

Please let us know if you are unhappy with how we have used your personal information. You can contact us by using any of the ways we've listed above in **Who we are**.

You also have the right to complain to the Information Commissioner's Office. You can find out on their website ([www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)) how to report a concern or you can phone them on 0303 123 1113.

### **Cookies**

To improve your experience on our website, we may use 'Cookies'. A cookie is a small text file that our site may place on your computer as a tool. You may refuse the use of cookies by selecting the appropriate settings on your browser, however if you do this, you may not be able to use the full functionality of our website.

Our website also uses Google Analytics, a service which transmits website traffic to Google servers in the United States. Google Analytics doesn't identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic and webpage usage. You can find out more at [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners).