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## **PRIVACY & COOKIE POLICY**

in respect of

**ZGRP Limited (Trading as Z Group)**

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# Privacy Policy

[www.zgrp.co.uk](http://www.zgrp.co.uk) (**Website**) is brought to you by ZGRP Limited (trading as Z Group), a company incorporated and registered in England and Wales under company number 9168494, whose registered office address is at Park House, 158-160 Arthur Road, Wimbledon Park, London, SW19 8AQ.

## Why you should read this policy

We take the privacy of our clients, employees and visitors to our Website (**you**) very seriously. Please read this privacy policy (**Policy**) carefully as it contains important information about how your personal data will be used.

Z Group (**'we' or 'us'**) collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and the Data Protection Act 2018. We are responsible as the 'data controller' of that personal information for the purposes of those laws.

## Personal data we may collect about you

### Information that you provide

We will obtain personal information from you when you send feedback, post material, contact us for any reason and by any medium, sign up to a service, share information via the Website's social media functions, or report a problem with the Website.

We collect data that is specifically and voluntarily provided by a visitor to our website. In most circumstances, this data includes limited identifiable information. Where we store any information collected via our website we will ensure that it is adequately protected.

We may ask you to provide sensitive personal data from time to time which may include data relating to health conditions or for equality purposes. If such data is requested, you will be given additional information as to why the sensitive personal data is being requested and how it will be used.

We may retain a record of any contact you make with us.

## **Personal Information about other individuals**

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- give consent on his/her behalf to the processing of his/her data;
- receive on his/her behalf any data protection notices;
- give consent to any transfer of his/her data;

## **Information from third parties**

Occasionally we may receive information about you from other sources, which will be added to the information already held about you in order for us to help supply our services and products to you.

## **Information that will be collected automatically**

**Cookies:** We may monitor your use of the Website through the use of cookies and similar tracking devices. For example, we may monitor how many times you use the Website, which pages you go to and traffic data. This information helps to build a profile of users to the Website. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually. For further information on the use of cookies on the Website, please see the sections on cookies below.

## **How your personal data will be used**

We will use your personal data for the following purposes:

- to register for certain areas of the site;
- to help identify you and any accounts you hold with us;
- to enquire for further information;
- to provide our services;
- administration;
- fraud prevention and detection;
- invoicing for services to be supplied;
- to distribute requested reference materials;
- customising the Website and its content to your particular preferences;

- to notify you of any changes to the Website or to our services or products that may affect you;
- improving our services and products.

### **What is our lawful basis or ground for using your personal data?**

Under laws that are designed to protect your personal data, we need to have what is called a lawful basis or ground each time we use, share or otherwise process your personal data.

By reading and agreeing to this Privacy Policy, you are consenting to us processing your personal data as detailed within this Privacy Policy.

We may also need to process your personal data to comply with any legal obligations which may be applicable. Likewise, we may process your personal data where this is in the public interest or it is to protect your vital interests, but this will only be in rare circumstances.

In most cases, our processing of your personal data is necessary for the performance of our services to you.

Certain uses of your personal data, or other processing activities, may not be strictly necessary to perform our services to you, however, they may be necessary for the purposes of our legitimate interests or the legitimate interests of a third party. They may also be in your interests.

When we say "legitimate interests", we mean our (or a third party's) interests in enabling us to provide our services to you as efficiently and securely as possible. For example, we may choose to use a third party to store your personal data; we may do this in part because our use of that service means that your personal data is more secure.

### **Marketing**

If you have provided your consent to receive news, special offers or promotions from us, we may contact you by mail, telephone and email, about our products, services, promotions, special offers and charitable causes that may be of interest to you.

The Website may contain links to other websites or apps which we or our partners own, or websites or apps of our partners or third parties. Please note that if you follow any of these links, the websites, apps and services provided through them will have their own privacy policies/terms of use. We do not accept any responsibility or liability for their respective privacy policies/terms of use or the collection and use of any personal data collected through these websites, apps or services. Please ensure that you review the

relevant privacy policies/terms of use prior to providing any personal data to, or using these websites, apps and services.

### **Disclosure of your personal data**

We may disclose your personal data to:

- other companies that become partners or part of a group with Z Group;
- a third party who acquires Z Group or acquires substantially all of its assets, in which case the personal data shall be one of the acquired assets;
- our agents and service providers;
- law enforcement and regulatory agencies in connection with any investigation to help prevent unlawful activity or as otherwise required by applicable law;
- business partners in accordance with the 'Marketing' section above;
- our clients when as part of a contracted service such as collating data sets collected from surveys.

Our website does not collect or compile personally identifying information for dissemination or sale to outside parties for consumer marketing purposes, or host mailings on behalf of third parties.

### **Keeping your data secure**

We will use technical and organisational measures to safeguard your personal data, for example:

- We will store your personal data on secure servers;
- We will ensure that hard copies of data are stored securely;
- Only authorised Z Group personnel are provided access to personally identifiable information and these employees have agreed to ensure confidentiality of this information.

While we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred from you or to you via the internet.

## **Transfers of data out of the EEA**

Your personal information may be transferred to third party service providers who process information on Z Group's behalf, including providers of information technology, identity management, website hosting and management, data analysis, data back-up, security and storage purposes. As a result, your personal data may be transferred outside of the country where you are located, including outside of the European Economic Area (**EEA**). Where we use data servers that may transfer data out of the EEA we will take steps to ensure adequate protections are in place to ensure the security of your information and give you remedies in the unlikely event of a security breach.

Please note that we review all processors we utilise and ensure that there are adequate safeguards in place to protect your personal data, such as adherence to binding corporate rules or compliance with the **EU-US Privacy Shield Framework**, which is a mechanism that ensures compliance with EU data protection requirements when transferring personal data from the European Union to the United States. You can learn more about Privacy Shield here: <https://www.privacyshield.gov/welcome>

## **What you can do to keep your information safe**

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

## **Monitoring**

We may monitor and record communications with you (such as telephone conversations and emails) for the purpose of quality assurance, training, fraud prevention and compliance.

## **Your Rights**

We will collect and store information about you, as detailed above. You will be provided with opportunities to consent to this Privacy Policy and marketing when you provide your personal details to us.

You can change your mind or remove or add your consent at any time.

- You have the **right of access** to your personal records or other information that we hold about you. There is no administrative charge for this service.

- You have the **right to rectify any errors** in the data we hold about you. If any data or information we hold about you is inaccurate, or out of date, please contact us and we will correct this immediately.
- You may have the **right to have the data we hold about you erased**.
- If you wish us to continue to store your information but **wish us to keep your data separate** and not process it in any way, please let us know.
- You have the right to ask us to **stop processing your personal data for direct marketing purposes**. You may also specify that you object to direct marketing by particular channels such as by email or telephone. If this is the case, please specify the channels you are objecting to in your communications with us.
- You have the **right to data portability**. If you wish to obtain your data for your own purposes across different services, we will provide this information to you in a CSV file. There is no administrative charge for this service.

To revise your consent, access, amend or remove your records or assert any of your rights set out above, you should send your request in writing to us at [info@zgrp.co.uk](mailto:info@zgrp.co.uk).

You will need to provide proof of identity and address (eg a copy of your driving licence or passport, and a recent utility or credit card bill); and specify the personal data you want access to, amended or removed.

### **How long we will store your data**

We will store your data for as long as necessary for the purpose of processing. The data may be deleted in the following circumstances:

- You have withdrawn your consent to data processing
- The original purpose for processing the data is no longer relevant or cannot be performed any more.
- The data is no longer up to date or accurate.
- Where we no longer have a reason to store your data as determined by our Data Retention Policy.

### **Children**

We do not contract directly with individuals below the age of 18. However, there may be instances where we collect and store data in relation to children. Where we do so, we confirm that we will take the necessary steps to protect this data and will meet our legislative requirements by obtaining parental or guardian consent.

## **Use of cookies**

A cookie is a small text file which is placed onto your mobile (or other electronic device) when you access the Website. We use cookies and other online tracking devices on the Website to:

- recognise you whenever you visit the Website (this speeds up your access to the Website as you do not have to log on each time);
- obtain information about your preferences, online movements and use of the internet;
- carry out research and statistical analysis to help improve the Website content, products and services and to help us better understand our visitor and customer requirements and interests; and
- make your online experience more efficient and enjoyable.

The information we obtain from the use of cookies will not usually contain your personal data. Although we may obtain information about your device such as your IP address, your browser and/or other internet log information, this will not usually identify you personally. In certain circumstances we may collect personal information about you, but only where you voluntarily provide it (eg by completing an online form).

In most cases we will need your consent in order to use cookies on this Website. The exception is where the cookie is essential in order for us to provide you with a service you have requested (eg to enable you to put items in your shopping basket and use the check-out process).

## **Third party cookies**

We work with third-party suppliers who may also set cookies on the Website which, for example, we may use to display video content. These third-party suppliers are responsible for the cookies they set on our Website. If you want further information, please go to the website for the relevant third party. You will find additional information in the table below.

## **Description of cookies**

The cookies that we utilise on our Website are placed to fulfil such functions as allowing visitors to share content with a range of networking and sharing platforms, analysing how you use the Website and giving you a better more personalised experience.

Our Website uses the following cookies:



- **Session cookies** expire at the end of your browser session and allow us to link your actions during that particular browser session.
- **Persistent cookies** are stored on your device in between browser sessions, allowing us to remember your preferences or actions across multiple sites.

Some of the cookies we utilise on our website include:

Cookie Name	Cookie Description
[INSERT NAME]	Definition:  Source:  Duration:

### How to turn off cookies

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of the Website. For further information about cookies and how to disable them please go to: [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

### Our contact details

We welcome your feedback and questions. If you wish to contact us or our Data Protection Officer, please send us an email to [info@zgrp.co.uk](mailto:info@zgrp.co.uk) or by calling us on +44 (0) 208 944 1180 or +44 (0) 208 947 3361. Alternatively, you may write to us at ZGRP Limited, Ibox House, 162-164 Arthur Road, Wimbledon, London, SW19 8AQ. When contacting us please specify that the communication is for the Data Protection Officer.

### Changes to this privacy policy

We may change this Policy from time to time. You should check this policy frequently to ensure you are aware of the most recent version that will apply each time you use the Website.

### Data Protection Supervisory Authority

The Data Protection Supervisory Authority in the UK is the Information Commissioners Office. Should you have any complaints about the way we handle your data, you may

direct them to the ICO. More information on the ICO can be found on their website here:  
<https://ico.org.uk>