

PRIVACY NOTICE

Background

The Briars Group and its subsidiaries, understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits Our website www.briarsgroup.com ("Our Site") and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the relevant laws as the Data Controller, which means we make decisions about how and why we process your personal data and are responsible for making sure it is used in accordance with data protection laws.

Please read this Privacy Policy and Notice carefully and ensure that you understand it.

1. Definitions and interpretation

In this Policy the following terms shall have the following meanings:

"Data Protection Legislation"	Means the UK GDPR, The General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR), the Irish Data Protection Act 2018 ("DP Act") and any other relevant data protection laws, collectively, "Data Protection Legislation".
"Account"	means an account required to access and/or use certain areas and features of Our Site;
"Cookie"	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 14, below.

2. Information about The Briars Group

The Briars Group Limited is a private limited company registered in England under company number 03355064. The registered address is Oak House, Tanshire Park, Shackleford Road, Elstead, GU8 6LB, United Kingdom.

3. What does this Notice cover?

This Privacy Notice applies only to your use of Our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

4. What Is Personal Data?

Personal data is defined by the Data Protection Legislation as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

5. What are my rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact the DPO to find out more or to ask any questions – see Part 15.
- b) The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the lawful basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling, although we do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, telephone: 0303 123 1113.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, so please contact us first, using the details in Part 15.

6. What data do we collect and how?

Depending upon your use of Our Site, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. Please also see Part 14 for more information about our use of Cookies and similar technologies. We do not collect any 'special category' or 'sensitive' personal data or personal data relating to children.

THE BRIARS GROUP – PRIVACY NOTICE AND COOKIE POLICY

Category of data	Data Collected	How We Collect the Data
Contact information	Job applications where we may collect, store and use your contact details, vacancy application and associated essential papers in order to process your application through the recruitment process. – <i>Please note that this data is limited to the relevant personnel within The Briars Group responsible for recruitment or the websites maintenance.</i>	Data is collected via a form on the website.
Client information	Information provided at the time of contracting to be a client of The Briars Group, when posting material on The Briars Group LinkedIn site or when enquiring about Briars services through our info@briarsgroup.com address.	Data is collected via a form on the website or LinkedIn site.
Website information	Website usage information which we collect and maintain relating to your use of our website where you have accepted the website's Cookies. We do this to better understand the types of visitors visiting our websites with the view to improving your experience. Unless you provide us with specific personal data (as mentioned above in job applications) the data that we obtain from your visit to our websites precludes individual identification and our marketing reports are aggregate anonymous reports. Please see below under the heading "Cookies".	Data is collected via Cookies that have been accepted. .
Sensitive information (only in relation to certain Clients or suppliers).	Racial or ethnic origin (including your nationality and passport information). Information relating to actual or suspected criminal convictions and offences, pursuant to anti-money laundering and identity checks).	Data is collected from you. Data is also collected via third party systems used for our identity checks.

7. How do we use/process your Personal Data?

We collect information about you to support the delivery of our contracted services to you, to manage your account, to process your job application and, with your consent, to keep you informed about The Briars Group services that may be of interest to you and relevant to your businesses. Where consent has been obtained, we will only share your information with GDPR-compliant third parties when deemed appropriate and of benefit to you. We may also share your personal information with GDPR-compliant third parties when legally instructed, or where The Briars Group has a justifiable legitimate interest (such as for auditing purposes). We will not provide your personal information to third parties for any other purpose, unless you have given your permission.

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

Category of data	Purpose	Lawful Basis for Processing			
		Consent	Perform a contract	Comply with legal obligation	Legitimate interest
Contact information	Responding to enquiries and/or complaints.		✓		
	Sending information such as a newsletter.	✓			
Website information	Ensure the operation and performance of the website	✓			
Client/Supplier information	Confirming the services that you wish to take, either as a Client or a supplier.		✓		
	To ensure delivery and performance of the service or deal with any complaints.		✓		
	To protect genuine Clients and our business from fraud and minimise the risk of false details being used.		✓	✓	
General	Complying with instructions from law enforcement agencies, any court or otherwise required by law			✓	
	Record keeping of Client details		✓		
	Keep records required by law or to evidence our compliance with laws including AML, tax laws and data protection laws.			✓	

Please note that:

- we will use your information collected from the website to personalise and improve your repeat visits and for statistical analysis only.
- your data is limited to the relevant personnel within The Briars Group responsible for a given task (such as recruitment where you have applied for a vacancy) or the websites' maintenance.

We would like to send you information about The Briars Group and our services that will be of interest and benefit to you. This may include contacting you by email or telephone or post. If you have consented to receive marketing, you may opt out at any time. You have a right to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please send an email to gdpr@briarsgroup.com

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 15.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the lawful basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

8. How long will we keep your Personal Data?

We will only retain your personal data for a limited period of time and for no longer than is necessary for the purposes for which we are processing it for.

If required by law or regulations, we may retain your details further but only under specific circumstances.

9. How and where do you store or transfer my Personal Data and is it secure?

We may store some or all of your personal data in the UK, EEA or in some cases countries outside of the UK/EEA. These are known as "third countries". Where we do store your personal data in "third-countries", we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

We will use specific approved contracts which ensure the same levels of personal data protection that apply under the Data Protection Legislation. For further information, please refer to the [Information Commissioner's Office](#).

The Briars Group uses industry-standard SSL certificates to encrypt website traffic to safeguard all data sent and received. We maintain appropriate technical and organisational security measures targeted at the protection of your personal data from unauthorised or unlawful use, and against accidental loss, damage or destruction.

Please contact us using the details below in Part 15 for further information about the particular data protection safeguards used by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

10. Do you share my Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

- If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Notice.
- In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.
- We may share your personal data with other companies in our group including subsidiaries.
- We may sometimes contract with the third parties to supply certain services. If any of your personal data is shared with such a third party, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 9.

If any personal data is transferred outside of the UK or the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 9.

11. Can I control my Personal Data?

In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Site, you may be given options to restrict our use of your personal data and the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails or at the point of providing your details.

12. Can I withhold information?

You may access certain areas of Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Part 14.

13. **How can I access my Personal Data?**

You have the right to:

- request a copy of the information that we hold about you;
- object or request erasure, anonymisation or blockage of data processed in breach of the law;
- object on legitimate grounds to processing of the data;
- restrict how we process your personal data.

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate. If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”. All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15. There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

14. **Third Party Processors**

Digital Marketing Service Providers

Our carefully selected partners and service providers may process personal information about you on our behalf as described below:

We periodically appoint digital marketing agents to conduct marketing activity on our behalf, such activity may result in the compliant processing of personal information. Our appointed data processors include:

(i) Prospect Global Ltd (trading as Sopro) Reg. UK Co. 09648733. You can contact Sopro and view their privacy policy here: <http://sopro.io>. Sopro are registered with the ICO Reg: ZA346877 their Data Protection Officer can be emailed at: dpo@sopro.io.

15. **How do you use Cookies?**

Our Site may place and access certain first-party Cookies on your computer or device. Cookies are small text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use and to compile statistical reports on activity. For further information visit www.aboutcookies.org or www.allaboutcookies.org. You can set your browser not to accept Cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result. All Cookies used by and on Our Site are used in accordance with current Cookie Law.

16. **How do I contact you?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Data Protection Officer (“DPO”): Gemma Bignell

Email address: gdpr@briarsgroup.com

Telephone number: +44 (0) 1483 413400

Postal Address: Oak House, Tanshire Park, Shackleford Road, Elstead, GU8 6LB, UK.

17. **Changes to this Privacy Notice**

This Privacy Notice was applicable from 15 May 2018. We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Notice on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

This Privacy Notice was last updated April 2021.