

## **1. INTRODUCTION**

Belasco Associates Limited is committed to maintaining robust privacy protections.

Our Privacy Policy describes how Belasco Associates Limited (“Belasco Associates”, “the company”, “we”, “us”, “our”) processes personal data when using our services.

This Policy is designed to explain how we collect, use and safeguard the information you provide to us in accordance with the General Data Protection Regulation (GDPR).

The GDPR legislation protects the unlawful processing of personal data to strengthen and protect the rights of users. GDPR does not apply to information already held in the public domain.

## **2. INFORMATION WE COLLECT**

Belasco Associates collects two types of information, “Non-Personal Information” and “Personal Information.”

### **Personal Information**

At Belasco Associates, we hold data on file for each client and related project. This data contains information that you have submitted to us or we have had to obtain in order for us to carry out our Consultancy Services. We also require Personal Information for accounting purposes. Personal Information also includes your contact information, which you submit to us through the contact section of the website.

### **Non-Personal Information**

We collect non-personal digital data when you visit our website and social media platforms. Non-Personal Information includes information that cannot be used to personally identify you, such as anonymous usage data, general demographic information we may collect, referring/exit pages and URLs, platform types, preferences you submit and preferences that are generated based on the data you submit and number of clicks.

We mainly use Non-Personal Information in the form of Cookies to help us improve, track trends and analyse user patterns on our website. Cookies enable Belasco Associates to analyse website traffic and to see which areas of the website you have visited.

## **3. USE OF INFORMATION**

Belasco Associates uses personal data collected to operate services on instruction of clients.

Belasco Associates may forward your Personal Information to third parties that have been employed by us to undertake work on our behalf. We require companies to comply fully with the GDPR legislation.

Personal Information you provide to us is also used to help us communicate with you. For example, we use Personal Information to contact users in response to questions and inform users about our services.

Belasco Associates will not sell, trade, rent or otherwise share for marketing purposes your Personal Information with third parties without your consent. We do share Personal Information with vendors who are performing services for the Company, such as the servers for our email communications who are provided access to user's email address for purposes of sending emails from us. Those vendors use your personal information only at our direction and in accordance with our Privacy Policy.

We track information using cookies, or small text files which include an anonymous unique identifier. Cookies are sent to a user's browser from our servers and are stored on the user's computer hard drive. Sending a cookie to a user's browser enables us to collect Non-Personal information about that user and keep a record of the user's preferences when utilizing our services, both on an individual and aggregate basis. We may use both persistent and session cookies; persistent cookies remain on your computer after you close your session and until you delete them, while session cookies expire when you close your browser.

You will have seen a pop up, when visiting our website ([www.belasco-associates.co.uk](http://www.belasco-associates.co.uk)) asking for your consent to the use of cookies. You may not see this notice each time you visit so should you wish to withdraw your consent, you can do so by disabling them in your browser.

In the event Belasco Associates undergoes a business transaction such as a merger, acquisition by another company, or sale of all or a portion of our assets, your Personal Information may be among the assets transferred. You acknowledge and consent that such transfers may occur and are permitted by this Privacy Policy, and that any acquirer of our assets may continue to process your Personal Information as set forth in this Privacy Policy. If our information practices change at any time in the future, we will post the Policy changes to our website so that you may opt out of the new information practices.

#### **4. HOW WE PROTECT INFORMATION**

We implement security measures designed to protect your information from unauthorized access. We further protect your information from potential security breaches by implementing certain technological security measures including encryption, firewalls and secure socket layer technology. However, these measures do not guarantee that your information will not be accessed, disclosed, altered or destroyed by breach of such firewalls and secure server software. By using our service, you acknowledge that you understand and agree to assume these risks.

#### **5. YOUR RIGHTS REGARDING THE USE OF YOUR PERSONAL INFORMATION**

You have the right at any time to prevent us from contacting you for marketing purposes. When we send communication to a user, the user can opt out of further promotional communications by following the unsubscribe instructions provided in each promotional e-mail or by contacting us directly on [info@belasco-associates.co.uk](mailto:info@belasco-associates.co.uk)

You can also indicate that you do not wish to receive marketing communications from us. Please note that notwithstanding the promotional preferences you indicate by either unsubscribing or opting out, we may continue to send you administrative emails including, for example, periodic updates to our Privacy Policy.

## **6. RETENTION POLICY**

Belasco Associates will only continue to store Personal Information if under requirements of the case, project or contract. After a case is completed, we will continue to store Personal Information for a maximum of five years. We undertake additional security measures to destroy Personal Information.

## **7. LINKS TO OTHER WEBSITES**

As part of the Service, we may provide links to or compatibility with other websites or applications. However, we are not responsible for the privacy practices employed by those websites or the information or content they contain. This Privacy Policy applies solely to information collected by us through our website and the service. Therefore, this Privacy Policy does not apply to your use of a third-party website accessed by selecting a link on our Site or via our Service. To the extent that you access or use the Service through or on another website or application, then the privacy policy of that other website or application will apply to your access or use of that site or application. We encourage our users to read the privacy statements of other websites before proceeding to use them.

## **8. DATA STORAGE**

Data is solely stored within the United Kingdom.

## **9. ACCESS TO YOUR PERSONAL INFORMATION**

Under the GDPR legislation, you have the right to access and amend any of your personal data that we hold.

## **10. CONSENT**

By accepting our Privacy Policy, you are consenting to Belasco Associates processing your data as described in this Privacy Policy. If you would like to withdraw your consent, please email [info@belasco-associates.co.uk](mailto:info@belasco-associates.co.uk).

## **11. CHANGES TO OUR PRIVACY POLICY**

This Policy may be subject to change in future at any time, in line with legislation. This Privacy Policy was last updated on 11<sup>th</sup> January 2019.

## **12. CONTACT US**

If you have any questions regarding this Privacy Policy, please contact us by sending an email to [info@belasco-associates.co.uk](mailto:info@belasco-associates.co.uk)