

## PRIVACY STATEMENT

At NUTS Ltd we take your privacy as seriously as we take our own. At all times we want to be fair, honest and open about how we gather, hold and use your personal data.

Any personal data of yours we hold will either have been provided freely by you, will be data provided by a third party (including your employer) authorised by you to share your data with us, or will be data that is already publicly available.

We will use your personal data only to send information to you about our products and services or to provide to you the products or services requested from us by you (or your employer). We will not at any time share or distribute in any form your personal data with any third party outside of NUTS Ltd without your prior consent. Such consent, once given may be withdrawn by you at any time.

It is not anticipated that any data held by NUTS Ltd will be particularly sensitive in nature. The type(s) of data that we are likely to hold is limited largely to business contact details along with any email correspondence with you directly.

Any information about you held by us will be done so securely.

In order to prevent unauthorised disclosure of, or access to, your information we have put in place strong physical and electronic security safeguards.

### Privacy Policy

This Privacy Policy sets out how we, Nurturing Unconscious Talent Specialists Ltd, collect, store and use information about you when you use or interact with our website, [www.nuts-team.co.uk](http://www.nuts-team.co.uk) (our website) and where we otherwise obtain or collect information about you. This Privacy Policy is effective from 2<sup>nd</sup> November 2022.

### Summary

This section summarises how we obtain, store and use information about you. It is intended to provide a very general overview only. It is not complete in and of itself and it must be read in conjunction with the corresponding full sections of this Privacy Policy.

- Data controller: Alison Bevan

#### How we collect or obtain information about you:

- When you provide it to us (e.g. by contacting us, subscribing to receive email from us)
- From your use of our website, using cookies and similar technologies
- Information we collect: name, contact details, IP address, information from cookies, information about your computer or device (e.g. device and browser type), information about how you use our website (e.g. which pages you have viewed, the time when you view them and what you clicked on, the geographical location from which you accessed our website (based on your IP address), and company name or business name (if applicable).
- How we use your information: for administrative and business purposes (particularly to contact you), to improve our business and website, to fulfil our contractual obligations, to advertise our goods and services, to analyse your use of our website, and in connection with our legal rights and obligations.

- Disclosure of your information to third parties: only to the extent necessary to run our business, to our service providers, to fulfil any contracts we enter into with you and where required by law or to enforce our legal rights.

- Do we sell your information to third parties (other than in the course of a business sale or purchase): **No**

- How long we retain your information: for no longer than necessary, taking into account any legal obligations we have (e.g. to maintain records for tax purposes), any other legal basis we have for using your information (e.g. your consent, performance of a contract with you or our legitimate interests as a business). For specific retention periods in relation to certain information which we collect from you, please see the main section below entitled How long we retain your information.

#### Use of cookies and similar technologies:

- We use cookies and similar information-gathering technologies such as web beacons on our website including essential, functional and analytical. For more information, please visit our cookies policy using the link in the footer of our website.
  - Transfers of your information outside the European Economic Area: we will only transfer your information outside the Area if we are required to do so by law. Where we do so, we will ensure appropriate safeguards are in place.
- Use of automated decision making and profiling: we do not use automated decision making or profiling.
  - Sensitive personal information: we do not knowingly or intentionally collect what is commonly referred to as 'sensitive personal information'. Please do not submit sensitive personal information about you to us.

#### Our details

The data controller in respect of our website is Alison Bevan, Nurturing Unconscious Talent Specialists Ltd, Pippin House, 23 Orchard Close, New Alresford, Hampshire SO24 9PY. You can contact the data controller by writing to Nurturing Unconscious Talent Specialists Ltd at the address above or sending an email to [alison@nuts-team.co.uk](mailto:alison@nuts-team.co.uk).

#### Information we collect when you contact us

We collect and use information from individuals who contact us in accordance with this section.

##### Email

When you send an email to the email address displayed on our website we collect your email address and any other information you provide in that email (such as your name, telephone number and the information contained in any signature block in your email).

##### Legal basis

For processing our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation). Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence. Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation). Reason

when necessary to perform a contract: where your message relates to us providing you with our services or taking steps at your request prior to providing you with our services.

#### Contact form

When you contact us using our contact form, we collect your name, telephone number, email address, IP address. We also collect any other information you provide to us when you complete the contact form. If you do not provide the mandatory information required by our contact form, you will not be able to submit the contact form and we will not receive your enquiry.

#### Phone

When you contact us by phone, we collect your phone number and any information provide to us during your conversation with us.

#### Post

If you contact us by post, we will collect any information you provide to us in any postal communications you send us.

#### Accountants

We share information with our accountants for tax purposes. For example, we share invoices we issue and receive with our accountants for the purpose of completing tax returns and our end of year accounts.

#### Advisors

Occasionally, we obtain advice from advisors, such as accountants, financial advisors, lawyers and public relations professionals. We will share your information with these third parties only where it is necessary to enable these third parties to be able to provide us with the relevant advice.

### Disclosure and use of your information for legal reasons

Indicating possible criminal acts or threats to public security to a competent authority. If we suspect that criminal or potential criminal conduct has been occurred, we will in certain circumstances need to contact an appropriate authority, such as the police. This could be the case, for instance, if we suspect fraud or a cyber crime has been committed or if we receive threats or malicious communications towards us or third parties. We will generally only need to process your information for this purpose if you were involved or affected by such an incident in some way.

In connection with the enforcement or potential enforcement our legal rights. We will use your information in connection with the enforcement or potential enforcement of our legal rights, including, for example, sharing information with debt collection agencies if you do not pay amounts owed to us when you are contractually obliged to do so. Our legal rights may be contractual [(where we have entered into a contract with you) or non-contractual (such as legal rights that we have under copyright law or tort law).

In connection with a legal or potential legal dispute or proceedings. We may need to use your information if we are involved in a dispute with you or a third party for example, either to resolve the dispute or as part of any mediation, arbitration or court resolution or similar process.

For ongoing compliance with laws, regulations and other legal requirements. We will use and process your information in order to comply with legal obligations to which we are subject. For

example, we may need to disclose your information pursuant to a court order or subpoena if we receive one or to the National Crime Agency in connection with suspected or potential money laundering matters

## How long we retain your information

This section sets out how long we retain your information. We have set out specific retention periods where possible. Where that has not been possible, we have set out the criteria we use to determine the retention period.

### Retention periods

- Server log information: we retain information on our server logs for 5 years.
- Order information: when you place an order for goods and services, we retain that information for six years following the end of the financial year in which you placed your order, in accordance with our legal obligation to keep records for tax purposes.
- Correspondence and enquiries: when you make an enquiry or correspond with us for any reason, whether by email or via our contact form or by phone, we will retain your information for as long as it takes to respond to and resolve your enquiry, and for three months after which point we will delete your information.

Criteria for determining retention periods in any other circumstances, we will retain your information for no longer than necessary, taking into account the following:

- the purpose(s) and use of your information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future);
- whether we have any legal obligation to continue to process your information (such as any record-keeping obligations imposed by relevant law or regulation);
- whether we have any legal basis to continue to process your information (such as your consent);
- how valuable your information is (both now and in the future);
- any relevant agreed industry practices on how long information should be retained;
- the levels of risk, cost and liability involved with us continuing to hold the information;
- how hard it is to ensure that the information can be kept up to date and accurate;
- any relevant surrounding circumstances (such as the nature and status of our relationship with you).

## How we secure your information

Our company website [www.nuts-team.co.uk](http://www.nuts-team.co.uk) is hosted on the Wix.com platform. Wix.com provides us with the online platform that allows us to offer our services to you. Your data may be stored through Wix.com's data storage, databases and the general Wix.com applications. They store your data on secure servers behind a firewall.

We take appropriate technical and organisational measures to secure your information and to protect it against unauthorised or unlawful use and accidental loss or destruction.

including:

- only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
- using secure servers to store your information;
- verifying the identity of any individual who requests access to information prior to granting them access to information;

Transmission of information to us by email Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means), you do so entirely at your own risk. We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.

### Changes to our Privacy Policy.

We update and amend our Privacy Policy from time to time.

#### Minor changes to our Privacy Policy

Where we make minor changes to our Privacy Policy, we will update our Privacy Policy with a new effective date stated at the beginning of it. Our processing of your information will be governed by the practices set out in that new version of the Privacy Policy from its effective date onwards.

#### Major changes to our Privacy Policy or the purposes for which we process your information

Where we make major changes to our Privacy Policy or intend to use your information for a new purpose or a different purpose than the purposes for which we originally collected it, we will notify you by email (where possible) or by posting a notice on our website.

We will provide you with the information about the change in question and the purpose and any other relevant information before we use your information for that new purpose.

Wherever required, we will obtain your prior consent before using your information for a purpose that is different from the purposes for which we originally collected it.