

## **ABGi Privacy Policy**

ABGi is fully committed to handling personal information and protecting it in accordance with data protection legislation and best data protection practices.

This notice explains why and how we collect and use personal data and provides information about individuals' rights. It applies to personal data provided to us directly by the individuals themselves or by others or obtained from using this website. We may use personal data provided to us for any of the purposes described in this notice or as otherwise stated.

This website is not intended for children, and we do not knowingly collect data relating to children.

You must read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### **WHO WE ARE**

ABGi UK Limited, company number SC331999, with registered office at 6 Atholl Crescent, Edinburgh, Scotland, EH3 8HA

For all data matters contact [dpqueries@abgi-uk.com](mailto:dpqueries@abgi-uk.com)

ABGi UK is the controller and responsible for this website.

Postal address: 6 Atholl Crescent, Edinburgh, EH3 8HA

People responsible for Data Protection: Data Protection Team

Telephone number: 0330 660 0620

### **THE PERSONAL DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the Information Commissioner's Office.

We collect and use contact details for our clients in order to manage and maintain our relationship with those individuals.

As part of the services we provide to clients, we process many categories of personal data, including:

Identity data (including: name, age/date of birth, gender)

Contact data (including: email address, contact telephone number, postal address);  
Financial data (including: salary, payroll details and other financial-related details such as income); and  
Job data (including: role/job title, grade, experience).  
Generally, we collect personal data from our clients or from a third party acting on the instructions of the relevant client.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## **HOW WE COLLECT YOUR PERSONAL DATA**

We collect data and process data when you:

- place an order or apply for any of our products or services.
- correspond with us by post, phone, email
- voluntarily complete a customer survey or provide feedback on any of our message boards or via email
- use or view our website via your browser's cookies
- Sign up to our email newsletter
- use our 'livechat' website tool

Our Company may also receive your data from business-to-business data vendors.

## **HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

**Performance of Contract** this means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Legitimate Interest** this means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting [dpqueries@abgi-uk.com](mailto:dpqueries@abgi-uk.com).

**Comply with a legal or regulatory obligation** this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

**Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, with the legal bases we rely on to do so.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at [dpqueries@abgi-uk.com](mailto:dpqueries@abgi-uk.com) if you need details about the specific legal basis we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a potential or new client	(a) Identity (b) Contact (c) Marketing and Communications Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (keep our records up-to-date, market to you or provide services)
Managing our relationship with you (such as notifying you of changes to our privacy policy, asking you to leave a review / take a survey)	(a) Identity (b) Contact (c) Marketing and Communications Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (keeping records updated and to study how our clients use our services) (c) Necessary to comply with a legal obligation
Use data analytics to improve our website / products / services, marketing, client relationships / experience	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of clients for our products and services, to keep the website updated and relevant, to develop our business and to inform our marketing strategy)
To consider your application for a role with us	(a) Identity (b) Contract	Necessary for our legitimate interests to recruit staff for our business

## **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

You may ask us to stop sending marketing messages by contacting [dpqueries@abgi-uk.com](mailto:dpqueries@abgi-uk.com) or using the 'unsubscribe' link on any of our marketing emails.

## **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data 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 products, services and offers may be relevant for you.

You will receive marketing communications from us if you have:

- requested information from us or
- purchased goods or services from us or
- provided us with your details when you entered a competition or registered for a promotion

and, in each case, you have not opted out of receiving that marketing.

### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any company outside the ABGi group of companies for marketing purposes.

### **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting [dpqueries@abgi-uk.com](mailto:dpqueries@abgi-uk.com) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase.

### **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please email [dpqueries@abgi-uk.com](mailto:dpqueries@abgi-uk.com).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **WHO WE SHARE YOUR PERSONAL DATA WITH**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

**Internal Third Parties:**

ABGi UK is part of a group of companies with offices throughout the World. As part of being a group, we may share your information with other group members. For instance, if a client had a presence in a country where we offer similar services, we may introduce that client to our group company in that country. However, we will not share your data with other group entities without your prior permission. We will also only share the minimum amount of information necessary for the purpose.

**External Third Parties Service**

**Providers acting as Processors based in the UK:**

Force 24 Limited, company registration number 07448931 with registered office at Indigo Blu Office 2, Crown Point Road, Leeds, West Yorkshire, LS10 1EL– marketing automation provider (<https://force24.co.uk>)

Bonafide Business Connections Limited, company number 10667816, with registered office at 156 Great Charles Street, Queensway, Birmingham, England, B3 3HN – Business-to-Business business development (<https://bonafide-marketing.com>)

GB Marketing Solutions – Business-to-Business business development

Professional advisers acting as processors in various countries who provide data processing, IT and system administration services – list below:

Citrix Sharefile	Document Management
Salesforce UK Limited	Client relationship management system
Force24	Marketing Automation Platform
Ingram Micro Inc (CloudBlue)	subscription- based solution management
Jungle Disk	Data backup
Microsoft	Data processing, incorporating select AI services including, but not limited to, Microsoft Teams transcription service and Microsoft Azure AI services. Microsoft Office 365 productivity platform.
Sage (UK) Limited	Accounting management system
Sophos	Cyber-security platform
Talentsoft	HR Platform
JAMF Pro	Device Management Platform

- Our professional advisers acting as Processors or Joint Controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.

- HM Revenue & Customs, regulators and other authorities acting as Processors or Joint Controllers based in the United Kingdom who require reporting of Processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **INTERNATIONAL TRANSFERS**

As part of a global group of companies that have locations in various territories, as a result, we may need to share your data outside of the UK. However, we will only do this with your prior consent and share the minimum amount of information required necessary for the purpose. Whenever transferring data outside of the UK, we ensure a similar degree of protection is afforded by implementing safeguards.

Please contact [dpqueries@abgi-uk.com](mailto:dpqueries@abgi-uk.com) if you require more information on specific mechanisms used by us when transferring personal data outside of the UK.

## **DATA SECURITY**

The security of data we hold is something we take very seriously. We have certification under Cyber Essentials, a government-backed, industry-supported scheme to help organisations protect themselves against common online threats. This certification is renewed annually. Additionally, we have policies and procedures in place covering data protection, confidentiality and security and regularly review those measures we have in place to keep the data we hold secure.

We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **DATA RETENTION**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential

risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your Personal Data are available in our retention policy which you can request from us by [dpqueries@abgi-uk.com](mailto:dpqueries@abgi-uk.com)

In some circumstances you can ask us to delete your data: see Your legal rights below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **YOUR LEGAL RIGHTS**

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please email: [dpqueries@abgi-uk.com](mailto:dpqueries@abgi-uk.com).

### **No fee required (subject to exceptions)**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable administrative fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you of this within one month of receiving the request and keep you updated.

## **CHANGES TO THIS NOTICE AND YOUR DUTY TO INFORM US**

This privacy statement was last updated on 30 June 2024 and historic versions can be obtained from us by contacting us.

## **QUERIES, REQUESTS OR CONCERNS**

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact our Data Protection Team: [dpqueries@abgi-uk.com](mailto:dpqueries@abgi-uk.com).

While we will always seek to directly resolve all complaints about how it deals with Personal Data, individuals have the right to lodge a complaint with the Information Commissioner's Office ("ICO"). The contact details are as follows:

Telephone: 0303 123 1113 (office hours are Monday to Friday 9am to 5pm)

Website: <https://ico.org.uk/global/contact-us/>