

Privacy Notice
05 September 2023

Version Control

Version	Author	Date	Comments
00-01	Iain C. Steel	31/08/2023	Draft for review
01-01	Iain C. Steel	05/09/2023	Approved for issue

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Scope of this Notice

The operational approach of Beneffrey Consulting involves cooperative engagement with a variety of collaborators, who may be independent or work for other firms (acting as sub-contractors). Anyone brought into association with Beneffrey Consulting, regardless of being a direct employee or functioning under Beneffrey Consulting's guidance, will be denoted as "Consultant(s)" in this notice. In circumstances where a specific area of this notice is only applicable to Consultants employed as staff or Directors of Beneffrey Consulting, this will be differentiated as referring to a directly employed Consultant.

Beneffrey Consulting Ltd Privacy Notice

Collectively with any agreed contractual terms for the provision of our services, along with any other relevant documents referenced thereof, this notice sets out our commitment to safeguarding the privacy and confidentiality of personal data.

Beneffrey Consulting Ltd is a private limited company registered in Scotland, company registration number SC770479.

Our contact details

Name: Beneffrey Consulting Ltd.
Address: 124b Springkell Avenue
Glasgow
G41 4EU
Phone Number: 07968 331 809
E-mail: iain.steel@beneffrey.com

This notice is intended to help you to understand;

- (i) The type of personal information we collect
- (ii) How we get the personal information and how we will use it
- (iii) Lawful bases of processing your information
- (iv) Sharing of Information
- (v) How we store your personal information
- (vi) Your data protection rights
- (vii) How to complain

Beneffrey Consulting Ltd. reserve the right to monitor and update this Privacy Notice, particularly when changes in the scale and nature of our operations occur, and at any time where we update or change our procedures involved in processing personal data. Please review this Privacy Notice regularly to understand any changes that may be made in our procedures from time to time.

Definitions of Personal Data Types:

Personal data

Information relating to identifiable individuals, such as current and former Consultants, current and former employees, clients and suppliers.

Sensitive personal data

Personal data about an individual's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership (or non-membership), physical or mental health or condition, criminal offences, or related proceedings.

In the course of our ordinary business, we do not collect any specific sensitive personal data other than that of directly employed Consultants. However, any use of sensitive personal data will be strictly controlled in accordance with this notice.

The type of personal information we collect

The personal data we collect will depend on the nature of the services we are contracted, or otherwise engaged, to provide and the administration of such. This may include the following:

- Personal identifiers, contacts and characteristics to allow us to conduct and administer our normal business activities. For example; Contact details (including name, job title, address, phone number(s) and email address(es)), banking and financial details (to pay Consultants and suppliers);
- Professional information (such as job title, work history, experience and qualifications) for Consultants and prospective Consultants who may be involved in selection and engagement of Consultants, work allocation or bidding for new opportunities;
- Personal identifiers, contacts and characteristics to allow us to contact clients, prospective clients, Consultants and suppliers about future events/seminars, updates or other news articles. For example; Contact details (including name, job title, address, phone number(s) and email address(es)). If you do not want to receive updates, you may remove yourself from any updates by contacting us. We do not operate any mailing lists.

How we get the personal information and how we will use it

Most of the personal information we process is provided to us directly by you in the normal course of conducting our business. For example, by you providing contact information in relation to a matter, by engaging with Benefrey Consulting as a prospective Consultant, sub-contractor, or supplier.

Information we collect about you from others

Information may be passed to us by third parties in the course of providing our professional services. For example, Public sources (e.g. Companies House), professional services firms related to your engagement (e.g. lawyers, cost consultants). Such information will only be held and processed to the extent is necessary to conduct our normal business with you.

Information collected from you relating to other individuals

In the course of delivering our services, it may become necessary for us to collect and utilise personal data about you, your officers, employees and/or wider third parties. If you provide us with personal data concerning your officers or employees, you confirm that you are authorised to do so. You should take the necessary steps to ensure that these individuals are informed about how their data will be used by us.

Use of information

Wherever its source, we will hold and use personal information in the following ways:

- To communicate with you during the normal course of providing our services. This may include providing training, consultancy, support and dealing with enquiries.
- Provide you with information about future events/seminars, updates or other news articles. We do not operate any mailing lists therefore any contact will be on the basis of the pursuit of legitimate interests in contacting you.
- Verification of information in the sourcing and engagement of Consultants.
- To seek advice from third parties in connection with your requirements, for example; lawyers, cost consultants, specialist consultancy.
- Respond to any complaint.
- To prevent or comply with applicable laws, regulations, guidance or obligations (e.g. anti-money laundering, bribery and corruption investigations).

Lawful bases of processing your information:

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- a) Your consent. You are able to remove your consent at any time. You can do this by contacting:

Contact: Iain Steel
Title: Director of Procurement & Business Transformation
Name: Beneffrey Consulting Ltd.
Address: 124b Springkell Avenue
 Glasgow
 G41 4EU

Phone Number: 07968 331 809
E-mail: iain.steel@beneffrey.com

- b) We have a contractual obligation.
c) We have a legal obligation.
d) We have a vital interest.
e) We have a legitimate interest.

In the event that there we require specific and/or additional consent to use your personal data, we will contact you to ask for such consent. As above, if consent is the basis on which we will process your personal data is processed, you are able to remove your consent at any time.

Sharing of Information

We may share information with independent Consultants or Consultants who work for other firms (acting as sub-contractors). In this event, information will only be disclosed or shared with the express consent of the client (for example, where Beneffrey Consulting have agreed to engage additional flexible support to increase capacity in the provision of services).

In such circumstances, these Consultants will be considered our suppliers or sub-contractors, and they will use any data for the purposes of providing services to us (or directly to our clients on our behalf). This will be subject to appropriate due diligence, consent of the client and will be subject to a contractual agreement that includes appropriate data security provisions for the client, the Consultant and for Beneffrey Consulting.

There are potentially other times data may be shared on occasion, including, but not limited to:

- Wider consultancy and/or expert support and advice, eg. lawyers, cost consultants, to obtain advice relating to the client requirements.
- Disclosures to law enforcement agencies, where required by law.
- Beneffrey Consulting's professional indemnity insurer in the event a claim is made against us.

We will not disclose (or sell) your personal information to any other third parties for marketing purposes.

How we store your personal information

How long we keep your data for

We will store your data, typically in electronic files, for the duration necessary to accomplish the intended purposes for which the information was gathered. This retention period may also be determined by legal obligations or the terms outlined in any pertinent contracts you have with us. For example:

- To undertake the contracted, or otherwise engaged, scope of work. Typically, we would expect to retain documentation relating to a procurement matter for a minimum of 7 years from the date of your final invoice.
- To maintain a record of Consultants engaged for client work and records relating to their engagement and/or for the purpose of bidding for such client work
- To maintain a register of Consultants for bidding and client work
- To comply with any legal obligations
- To defend claims against us or our professional indemnity insurance.

At the end of any retention period, data will be deleted from our systems, laptops, desktops and cloud backup systems.

Security of your data

We acknowledge the inherent value of your data and are committed to safeguarding it whilst it is in our care.

To ensure the security of personal data and prevent loss, misuse, alteration, or destruction, we have implemented appropriate measures for example cloud backup, version and access controls. Similarly, we maintain rigorous confidentiality standards, including such safeguards as firewalls, anti-virus protection and data encryption.

Your data protection rights

Under data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. If you wish to make a request you can do this by contacting:

Contact: Iain Steel
Title: Director of Procurement & Business Transformation
Name: Beneffrey Consulting Ltd.
Address: 124b Springkell Avenue
 Glasgow,
 G41 4EU

Phone Number: 07968 331 809
E-mail: iain.steel@beneffrey.com

Website

The Beneffrey Consulting website may occasionally include hyperlinks to external websites over which we have no authority, and these websites are not governed by this Notice. We bear no responsibility or liability for the privacy notices or statements of these external sites. Should you choose to visit other websites via the provided links, we strongly advise that you review their privacy notices and policies prior to disclosing any personal information.

Please note, Beneffrey Consulting do not use cookies on our website.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at:

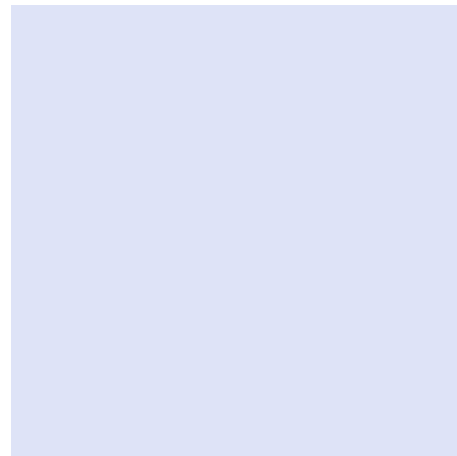
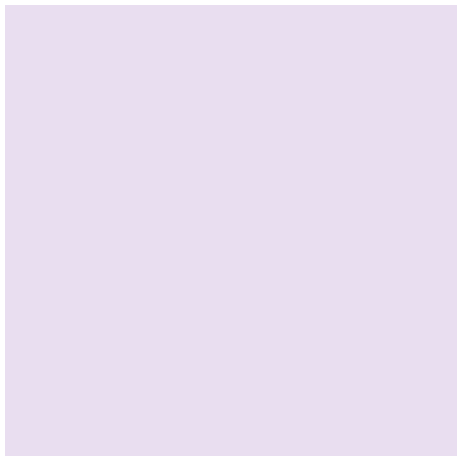
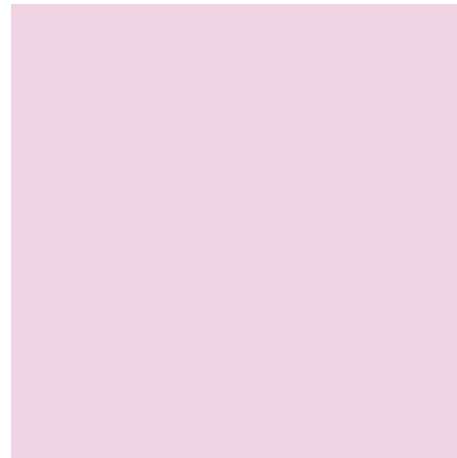
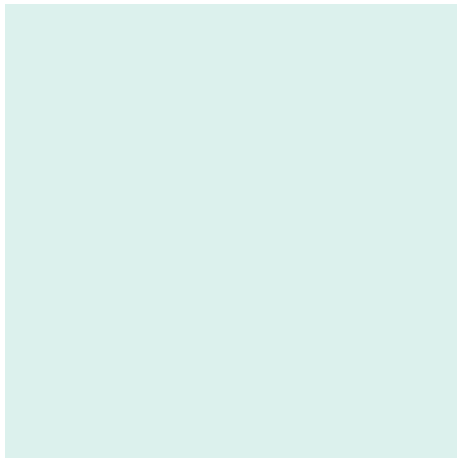
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You can also complain to the Information Commissioner's Office if you are unhappy with how we have used your data. The ICO's address is as follows:

Name: Information Commissioner's Office
Address: Wycliffe House
 Water Lane
 Wilmslow
 Cheshire
 SK9 5AF

Helpline number: 0303 123 1113
ICO website: <https://www.ico.org.uk>



Any reference in this document to 'BCL', 'Benefrey' or 'Benefrey Consulting' is to be construed as a reference to the entity Benefrey Consulting Ltd.

Benefrey Consulting Ltd is a private limited company registered in Scotland, company registration number SC770479

<https://benefrey.com/contact.html>

Registered office and trading address:

Benefrey Consulting Ltd
124b Springkell Avenue
Glasgow
G41 4EU