

BACKGROUND:

Harrison Spence Limited understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, <https://www.harrisonspence.com> (“Our Site”) and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately. Please note this policy applies equally if you have contacted us by telephone and disclosed information to us.

Definitions and Interpretation

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

“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 below. You may also refer to the Cookies page on our website.
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 and of EU Regulation 2016/679 General Data Protection Regulation (“GDPR”)
“personal data”	means all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site or additional data that you provide to us by other means such as by telephone or letter. This definition shall, where applicable, incorporate the definitions provided in EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”)
“We/Us/Our”	means Harrison Spence Limited, a limited company registered in England under company number 09010079, whose registered address is Littlemead, Hollingdon, Leighton Buzzard, LU7 0DN, and whose main trading address is 14-16 Norland Road, Holland Park, London W11 4TR

Information About Us

Our Site is owned and operated by Harrison Spence Limited, a limited company registered in England under company number 09010079, whose registered address is Little Mead, Hollingdon, Leighton Buzzard, LU7 0DN and whose main trading address is 14-16 Norland Road, Holland Park, London W11 4TR. Our Data Protection contact is Alan Marks, and can be contacted by email alan@harrisonspence.com, by telephone on 0207 602 0500, or by post at 14-16 Norland Road, Holland Park, London W11 4TR.

What Does This Policy Cover?

This Privacy Policy applies to your use of Our Site and to any other information that you provide us with. 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.

Your Rights

As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

- The right to be informed about Our collection and use of personal data;
- The right of access to the personal data We hold about you
- The right to rectification if any personal data We hold about you is inaccurate or incomplete please see below regarding How you can control your data
- The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, but if you would like Us to delete it sooner, please contact Us using the details stated below)
- The right to restrict (i.e. prevent) the processing of your personal data;
- The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- The right to object to Us using your personal data for particular purposes; and
- Rights with respect to automated decision making and profiling.

If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided below and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

For further information about your rights, please contact the Information Commissioner's Office Information is supplied on their website <https://ico.org.uk>

What Data Do We Collect?

Depending upon your use of Our Site, We may collect some or all of the following personal and non-personal data (please also see details below on Our use of Cookies and similar technologies)

If you engage us to provide you with a service, we will ask you to sign an Engagement Letter and possibly a Non-Disclosure agreement. At this stage we may ask you for more information. We will only ask you for information that is necessary to provide you with the requested service.

Please note some information will only be collected if you choose to send it to us via any of the contact forms located on this site and may include

- Name
- Gender
- Business/company name
- Job title
- Profession
- E-mail address and telephone numbers;
- Demographic information such as location, county and country;
- Any information you personally choose to send us such as the nature of your enquiry
- Analytical data regarding the use of our site.

How Do We Use Your Data?

All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see below.

Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:

- Providing and managing your Account
- Providing and managing your access to Our Site
- Personalising and tailoring your experience on Our Site;
- Supplying Our services to you (please note that We require your personal data in order to enter into a contract with you);
- Replying to emails from you;
- Supplying you with emails about our services (you may unsubscribe or opt-out at any time by clicking on a link in an e-mail);
- Asking you to take part in Market Research
- Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience
- Sending you further business information.

With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email, telephone, text message or post with information, news and offers on Our products and services.

We will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.

We will not send or share or sell your data to Third Parties for marketing purposes.

We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for a period of 7 years or until you ask us to delete it.

How and Where Do We Store Your Data?

We only keep your personal data for as long as We need to use it as described above or for as long as We have your permission to keep it.

Some or all your data may be stored outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). You are deemed to accept and agree to this by using Our Site and/ or by submitting information to Us. If We do store data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under GDPR regulation.

Do We Share Your Data?

We will not share any of your data with any third parties for any purposes other than where we are required to do so to provide a service (such as assisting with the sale or purchase of a business). In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority.

We may sometimes contract with third parties to supply products and services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, survey requests and e-mail marketing. In some cases, the third parties may require access to some or all your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.

Examples of the services we use are:

- Mailchimp or similar e-mail contact software
- Question Pro. – Survey Software
- Microsoft Exchange

We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to

identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

We may sometimes use third party data processors that are located outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Where We transfer any personal data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR regulation.

What Happens If Our Business Changes Hands?

We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes. When contacted you will not, however, be given the choice to have your data deleted or withheld from the new owner or controller.

How Can You Control Your Data?

When you submit personal data to us either online or by any other method, you have the right to restrict Our use of that data. You can contact our office using the details above and ask us to alter the information we hold on you if it is inaccurate. You also have a “Right to be Forgotten” If you request us to do so we shall erase personal data we hold on you without undue delay.

Marketing E-mails that you receive from us also have an “opt-out” facility and you can use this to inform us that you wish to unsubscribe and no longer wish to be contacted by us

Your Right to Withhold Information

You may access Our Site without providing any 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. To enable our site to function at it’s optimum and to provide us with statistical information we use Cookies. You are free to restrict our use of Cookies

OUR USE OF COOKIES

What are Cookies

Our Site may place and access certain First party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times. We have restricted use of Cookies on our site to those relating to providing us with website analytics.

Our Site uses analytics services provided by Google. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and ultimately the range of services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

The analytics service used by Our Site use(s) Cookies to gather the required information.

The analytics service(s) used by Our Site use(s) the following Cookies:

Name of Cookie	Period	Provider	Purpose
_ga	. 2 years	Google	Used to distinguish users.
_gid	24 hours	Google	Used to distinguish users.
_gat	1 minute	Google	Used to throttle request rate

All Cookies used by and on Our Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a consent form requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies;

In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). No fee is payable, and We will provide any and all information in response to your request free of charge. Please contact Us for more details at enquiries@harrisonspence.com, or using the contact form on our website

Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at enquiries@harrisonspence.com, or by telephone on Tel: 0207 602 0500, or by post at 14-16 Norland Road, Holland Park, London W11 4TR. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you.

Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. If you have signed a letter of engagement with us and our Privacy policy changes, we will send you a revised copy for your records.

We recommend that you check this page regularly to keep up-to-date.