

PRIVACY AND COOKIES POLICY

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1. Overview

Your privacy is important to us

When you communicate with Codub Consulting Ltd. ('CODUB'), you trust us with your information – and that's a responsibility we take very seriously. Our privacy policy spells out exactly what data we collect, who processes it and how we use it.

For over 15 years, CODUB, an international management consultancy company has worked with high profile blue chip companies offering highly integrated consultancy services across the full Property, IT and Infrastructure lifecycle.

We help develop Asset Management Plans (AMP) that provide the framework for managing assets in a safe, efficient and sustainable manner with respect to acquisition, maintenance, operation and disposal.

At the heart of what we do is **Data Governance** and with the evolving technologies and a better understanding of the importance of proper data management, Codub offers operational tools and skills to handle data and improve overall data quality.

2. Privacy notice

Our Data Protection Officer / GDPR Owner and data protection representatives can be contacted directly here:

- kevin@codubconsulting.com
- +44 84 5452 4127

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The personal data we would like to collect from you are:

Personal Data	Source
Contact Name	The data subject
Contact Email Addresses (Personal data related to individual email addresses within organisations i.e. john@company.co.uk. Email addresses such as info@ ,marketing@ or sales@ are not deemed as personal data)	The data subject
Contact Telephone Numbers	The data subject

The personal data we collect will be used for the following purposes:

- To carry out our obligations arising from any discussions/contracts entered by your organisation and us regarding our services;
- Seek your views or feedback on the services we provide;
- Notify you of changes to our services;
- Send you communications which you have requested and that may be of interest to you. These may include information about latest offers, promotions and news about CODUB.

3. Data Controller and the Data Processors

CODUB acts as a Data Controller and the Data Processors could be one of the following:

Data Processors	Services	GDPR Compliance Link
KRYSTAL	Website Hosting – All websites	https://krystal.co.uk/assets/resources/krystal-candidate-privacy-notice.pdf
MAILCHIMP	Email List Hosting for newsletters etc.	https://mailchimp.com/legal/privacy/?_ga=2.18244863.798679119.1526978438-1759843985.1522248598 http://cepurl.com/c97Tcr
QUICKBOOK	Accounting Services Hosting	https://quickbooks.intuit.com/uk/gdpr/ https://security.intuit.com/index.php/privacy
REDSTATION	Application Hosting i.e.ERP/EAM applications like Maintenance Connection, IBM Maximo, applications	www.redstation.com/privacy-policy
ZOHO	CRM Hosting for managing	www.zoho.com/gdpr.html

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	Leads	
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4. Consent

By consenting to this privacy notice you are giving us permission to collect and process your personal data specifically for the purposes identified. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by contacting us in writing via post or email. Details are: St. George's House, 215 - 219 Chester Road, Manchester M15 4JE | admin@codubconsulting.com

5. Disclosure

CODUB will not pass on your personal data to third parties without first obtaining your consent.

Retention period

CODUB will process personal data for the duration of the service contract with the data subject's organisation (CODUB's customer) or only for the duration that the data subject is employed by the organisation (CODUB's customer) and will store the personal data for no longer than 5 years after termination of services with CODUB.

6. Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to judicial review: in the event that Organisation Name refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain.

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7. Complaints

In the event that you wish to make a complaint about how your personal data is being processed by CODUB, or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and CODUB's data protection representatives Data Protection Officer / GDPR Owner.

The details for each of these contacts are:

	Supervisory authority contact details	[GDPR Owner] / [Data Protection Officer (DPO)] /contact details
Contact Name:	Information Commissioner's Office	Kevin
Address line 1	Wycliffe House	St. George's House,
Address line 2	Water Lane	215 - 219 Chester Road,
Address line 3	Wilmslow	
Address line 4	Cheshire	Manchester
Address line 5	SK9 5AF	M15 4JE
Email	registration@ico.org.uk	kevin@codubconsulting.com
Telephone:	0303 123 1113	0845 452 4127

8. Online privacy statement

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

How we use your information

This privacy notice tells you how we, and CODUB will collect and use your personal data to fulfil contractual obligations, communicate any service or company updates or communicate any service promotions.

Why does and CODUB need to collect and store personal data?

For us to provide you/your organisation with a room for your training/ meeting event, CODUB need to collect personal data for correspondence purposes and/or detailed service provision. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

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In terms of being contacted for marketing purposes and CODUB would contact you for additional consent.

How will CODUB use the personal data it collects about me?

CODUB will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. CODUB is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will CODUB contact me?

Our aim is not to be invasive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that the organisation holds about me?

CODUB at your request, can confirm what information we hold about you and how it is processed. If and CODUB does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.

What forms of ID will I need to provide in order to access this?

CODUB accepts the following forms of ID when information on your personal data is requested:

- o Passport;
- o Driving License;
- o Birth Certificate;
- o Utility Bill (From the last three months).

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Contact details of the Data Protection Officer / GDPR Owner:

[GDPR Owner] / [Data Protection Officer (DPO)] /contact details
Kevin
The CODUB Ltd.
St. George's House,
215 - 219 Chester Road,
Manchester M15 4JE
kevin@codubconsulting.com
0845 452 4127

9. Cookies

When we provide services to you on the internet, we want to make them easy, useful and reliable. This sometimes involves placing small amounts of information known as cookies on your computer or mobile device. These cookies are small files and cannot be used to identify you personally.

Cookies do lots of different jobs, like storing your preferences, and generally improving your experience of a website. Cookies are widely used in order to make websites work, or work more efficiently, as well as to provide user information to the owners of the site. They make the interaction between you and the website faster and easier.


Cookies are generally used to:

- measure how you use the website so it can be updated and improved based on your needs
- remember the notifications you've seen so that we don't show them to you again

10. Document Owner and Approval

The Data Protection Officer/ GDPR Owner is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff on the secured company drive.

Signature: 

Date: 21st May 2018