

CLEAR ROCK PROJECTS – PRIVACY NOTICE

Clear Rock Projects Ltd (CRN 13845062) (**we, us or our**), understands that protecting your personal data is important. This Privacy Notice sets out our commitment to protecting the privacy of personal data provided to us, or otherwise collected by us when providing our agile and project consultancy services, website and platform (**Services**) or when otherwise interacting with you.

It is important that you read this Privacy Notice together with any other detailed privacy notices we may provide when we are collecting or processing personal data about you so that you understand our privacy practices in relation to your data.

The information we collect

Personal information: is information that relates to an identified or identifiable individual.

We may collect, use, store and disclose different kinds of personal data about you which we have listed below:

- **Identity Data** including first name, last name and title.
- **Contact Data** including billing address, email address and telephone numbers.
- **Financial Data** including bank account and payment card details (through our third party payment processor, Stripe).
- **Transaction Data** including details about payments to you from us and from you to us and other details of products and services you have purchased from us or we have purchased from you.
- **Technical and Usage Data** including internet protocol (IP) address, your login data, your browser session, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour, information about your access and use of our website, including through the use of Internet cookies, your communications with our website, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider.
- **Profile Data** including your username and password for our platform, purchases or orders you have made with us, support requests you have made, content you post, send receive and share through our platform, your feedback and survey responses.
- **Interaction Data** including information you provide to us when you participate in any interactive features of our Services, including surveys, contests, promotions, activities or events.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Professional data** including where you are a worker of ours or applying for a role with us, your professional history such as your previous positions and professional experience.
- **We do not actively request Special Categories of Personal Data** about you, nor do we collect any information about criminal convictions and offences. If at any time we need to collect special categories of data about you, we will only collect it and use it as required or authorised by law. **Special Categories of Personal Data** is a special category of personal data that 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.

How we collect personal information

We collect personal data in a variety of ways, including:

- **Directly:** We collect personal information which you directly provide to us, including when you register for an account on our platform, through the 'contact' form on our website or when you request our assistance via email or over the telephone.
- **Indirectly:** We may collect personal information which you indirectly provide to us while interacting with us, such as when you use our website, in emails, over the telephone and in your online enquiries.
- **From third parties:** We collect personal information from third parties, such as from your employer where they invite you to access our Services and details of your use of our website from our analytics and cookie providers and marketing providers. See the "Cookies" section below for more detail on the use of cookies.
- **From publicly available sources:** We collect personal data from publicly available resources such as Companies House and professional networking sites such as LinkedIn.

Purposes and legal bases for processing

We collect and process personal data about you only where we have legal bases for doing so under applicable laws. We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. 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 reach out to us if you need further details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose of use / disclosure	Type of Data	Legal Basis for processing
To enable you to access and use our platform, including to provide you with a login.	<ul style="list-style-type: none"> • Identity Data • Contact Data 	<ul style="list-style-type: none"> • Performance of a contract with you
To provide our Services to you, including to communicate with you and manage your appointments.	<ul style="list-style-type: none"> • Identity Data • Contact Data 	<ul style="list-style-type: none"> • Performance of a contract with you
To contact and communicate with you about our Services including in response to any support requests you lodge with us or other enquiries you make with us.	<ul style="list-style-type: none"> • Identity Data • Contact Data • Profile Data 	<ul style="list-style-type: none"> • Performance of a contract with you
To contact and communicate with you about any enquiries you make with us via our website.	<ul style="list-style-type: none"> • Identity Data • Contact Data 	<ul style="list-style-type: none"> • Legitimate interests: to ensure we provide the best client experience we can offer by answering all of your questions.
For internal record keeping, administrative, invoicing and billing purposes.	<ul style="list-style-type: none"> • Identity Data • Contact Data • Financial Data • Transaction Data 	<ul style="list-style-type: none"> • Performance of a contract with you • To comply with a legal obligation • Legitimate interests: to recover debts due to us and ensure we can notify you about changes to our client agreement and any other administrative points.
For market research and business development, including to operate and improve our Services and associated applications or platforms.	<ul style="list-style-type: none"> • Profile Data • Technical and usage Data • Interaction Data 	<ul style="list-style-type: none"> • Legitimate interests: to keep our website updated and relevant, to develop our business, improve our Services and to inform our marketing strategy
For advertising and marketing, including to send you promotional information about our events and experiences and information that we consider may be of interest to you.	<ul style="list-style-type: none"> • Identity Data • Contact Data • Technical and usage Data • Profile Data • Marketing and communications Data 	<ul style="list-style-type: none"> • Legitimate interests: to develop our Services and grow our business
To offer additional benefits to you.	<ul style="list-style-type: none"> • Identity Data • Contact Data • Profile Data • Interaction Data • Marketing and communications Data 	<ul style="list-style-type: none"> • Legitimate interests: to facilitate engagement with our business and grow our business
If you have applied for employment with us; to consider your employment application.	<ul style="list-style-type: none"> • Identity Data • Contact Data • Professional Data 	<ul style="list-style-type: none"> • Legitimate interests: to consider your employment application

To comply with our legal obligations or if otherwise required or authorised by law.		<ul style="list-style-type: none"> • To comply with a legal obligation
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If you have consented to our use of data about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your data because we or a third party have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using our services. Further information about your rights is available below.

Our disclosures of personal information to third parties

We may disclose personal information to:

- our employees, subcontractors and/or related entities;
- IT service providers, data storage, web-hosting and server providers such as Microsoft, Wix and monday.com;
- marketing or advertising providers such as Active Campaign and Mailchimp;
- professional advisors, bankers, auditors, our insurers and insurance brokers;
- payment systems operators such as Stripe;
- our existing or potential agents or business partners;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- third parties to collect and process data; and
- any other third parties as required or permitted by law, such as where we receive a subpoena.

Overseas transfers

Where we disclose personal data to the third parties listed above, these third parties may store, transfer or access personal data outside of the United Kingdom, including the EU (Amsterdam and Dublin), the USA and Israel. The level of data protection in countries outside of the United Kingdom may be less comprehensive than what is offered in the United Kingdom. Where we transfer your personal data outside of the United Kingdom, we will perform those transfers using appropriate safeguards in accordance with the requirements of applicable data protection laws and we will protect the transferred personal data in accordance with this Privacy Notice. This includes:

- only transferring your personal data to countries that have been deemed by applicable data protection laws to provide an adequate level of protection for personal data; or
- including standard contractual clauses in our agreements with third parties that are overseas.

Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

Your rights and controlling your personal data

Your choice: Please read this Privacy Notice carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Notice. You do not have to provide personal information to us, however, if you do not, it may affect our ability to provide our Services to you and your use of our Services.

Information from third parties: If we receive personal information about you from a third party, we will protect it as set out in this Privacy Notice. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

Access, correction, processing and portability: You may request details of the personal data that we hold about you and how we process it (commonly known as a "data subject request"). You may also have a right in accordance with applicable data protection law to have your personal data rectified or deleted, to restrict our processing of that information, to object

to decisions being made based on automated processing where the decision will produce a legal effect or a similarly significant effect on you, to stop unauthorised transfers of your personal information to a third party and, in some circumstances, to have personal information relating to you transferred to you or another organisation.

Unsubscribe: To unsubscribe from our e-mail database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

Withdraw consent: Where we are relying on consent to process your personal data, you have the right to withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Complaints: If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint. You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Storage and security

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

While we are committed to security, we cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

Cookies

We may use cookies on our website from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do recognise you when you return to our online website. You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our online Services. They include, for example, cookies that enable you to log into secure areas of our online Services, use a shopping cart or make use of online payment services.
- **Analytical/performance cookies.** These are cookies that allow us to recognise and count the number of visitors to our online Services and to see how visitors move around our online Services when they are using them. This helps us to improve the way our online Services work, for example, by ensuring that users find what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our online Services. These cookies enable us to personalise our content for you and remember your preferences (for example, your choice of language or region).
- **Social media cookies.** These cookies are used when you share information using a social media sharing button or "like" button on our websites or you link your account or engage with our content on or through a social media site. The social network will record that you have done this. This information may be linked to targeting/advertising activities.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie	Category	Purpose
userType	Analytical / performance	Third party cookie. Defines user type for analytic reports
XSRF-token	Essential	Required for security
pxvid	Essential	Third party cookie. Required for security
_wixCIDX	Essential	Required for site functionality
-wixUIDX	Essential	Required for site functionality

wixClient	Essential	Required for site functionality
bSession	Essential	Used for system effectiveness measurement
svSession	Essential	Used in connection with user login
hs	Essential	Used for security reasons
wixLanguage	Functional	Used on multilingual websites to save user language preference
consent-policy	Essential	Used for cookie banner parameters
_wix_browser_sess	Essential	Required for site functionality
wixSession2	Essential	Required for site functionality
_wixAB3	Analytical/ performance	Used at start of session to collect information on website traffic, duration and location

Links to other websites

Our website may contain links to other party's websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Notice.

Amendments

We may change this Privacy Notice from time to time. We will notify you if we make a significant change to this Privacy Notice, by contacting you through the contact details you have provided to us and by publishing an updated version on our website.

For any questions or notices, please contact us at:

Clear Rock Projects Ltd (CRN 13845062)

Email: hello@clearrockprojects.co.uk

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