

## **Icy Waters Consulting Limited Privacy Policy / Privacy Notice**

**Date: 5 December 2023**

### **Our contact details**

Address: The Oakley, Kidderminster Road, Droitwich, Worcestershire, WR9 9AY  
E-mail: data@icywaters.co.uk

### **The type of personal information we collect**

We currently collect and process the following information:

- Identity data which includes name, pronoun, gender
- Contact data which includes addresses (personal, billing, service addresses), email, telephone phone numbers and business details
- Details of our interactions with you, including any financial transactions and contracts

### **How we get the personal information and why we have it**

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- Maintaining business relationships to explore future work, discuss past work, explore opportunities.
- Enable a working relationship to deliver current work and existing contracts

You may give us your identity and contact by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- Apply for our products or services
- Request marketing to be sent to you
- Connect through social media platforms such as LinkedIn and other networking events and forum

### **How we use your personal data**

We use the information that you have given us to:

- Market our services
- Fulfil existing contracts and work together
- Explore opportunities to work together
- Let you know how the business is doing and providing you with regular news and updates
- Register you as a current or potential client, supplier or collaborator

We may share this information with:

- other organisations who are part of an existing package of work we are delivering with you
- Professional advisers including lawyers, bankers, auditors and insurers based in the UK and Europe who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities

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

- 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).
- 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.

## How we store your personal information

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, 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.

Your information is securely stored on password protected computer devices and in cloud storage that is also password protected.

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.

By law we have to keep basic information about our customers (including contact, identity, financial and transaction data) for six years after they cease being customers for tax purposes.

We keep your name, address, email, phone numbers, business details and nature of our relationship for twelve years after the last contact with you.

We will dispose of your information by deleting the data from the computer device and cloud storage solution.

## Your data protection rights

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

- **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.

If you wish to exercise any of the rights set out above, please contact [data@icywaters.co.uk](mailto:data@icywaters.co.uk) or Icy Waters Consulting Limited, The Oakley, Kidderminster Road, Droitwich, Worcestershire, WR9 9AY.

- **No fee required – with some 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 admin 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 and keep you updated.

## How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at [data@icywaters.co.uk](mailto:data@icywaters.co.uk).

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

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

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>