



## PRIVACY STATEMENT

### Introduction

ibex gale Limited ('ibex gale', 'we', 'us') respects the privacy of every individual whose personal information we process in providing our services, or whose personal information we may process as a result of providing our services to others, or who applies to work at ibex gale.

Personal information is any information relating to an identified or identifiable living person. When 'you' or 'your' are used in this statement, we are referring to the relevant individual who is the subject of the personal data. ibex gale processes personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose may differ.

### Purpose of this Privacy Statement

This privacy statement ('Privacy Statement') explains our approach to any personal information that we might collect from you, or which we have obtained about you from a third party, and the purposes for which we process your personal information. This Privacy Statement also sets out your rights in respect of our processing of your personal information.

This Privacy Statement, along with any information provided to you at the point of collection, will inform you of the nature of the personal information about you that is processed by us and how you can request that we delete, update, transfer and/or provide you with access to it.

This Privacy Statement is intended to assist you in understanding how your personal information may be processed by us as a result of providing the Services to others or when you apply to work at ibex gale. We encourage you to read and understand it.

Ibex gale is registered with the ICO, and has appointed David Major, Director, as the person with responsibility for data protection compliance within the organisation. He can be contacted at [dmajor@ibexgale.com](mailto:dmajor@ibexgale.com).

### Who we are and what we do

ibex gale is an English limited company under number 08814594 and whose registered office is at St Brandon's house, 29 Great George Street, Bristol BS1 5QT.



ibex gale provides a range of legal services and people management support to organisations, including workplace investigations, mediation and conflict resolution, cultural reviews, organisational change projects and strategic people management.

In some cases we will process data on behalf of organisations that we carry out work for. There may also be cases where we act as the data controller. Whether we are a data processor or a data controller for the purposes of your data will depend on the nature of the arrangements between us and the organisation we are working for and the nature of the services that we are carrying out.

### **How to contact us**

If you have any questions about this Privacy Statement or want to exercise your rights as set out in this Privacy Statement, please contact us by sending an email to our Data Protection Officer, David Major, at [dmajor@ibexgale.com](mailto:dmajor@ibexgale.com)

### **Collection of personal information**

Generally, we collect personal data from our clients or from third parties when providing services to the relevant client.

Our policy is to collect only the personal data necessary for agreed purposes and we ask our clients to only share personal information with us where it is required for those purposes and in accordance with relevant data privacy laws.

Where we need to process personal information to provide services, we ask our clients to provide the necessary information to the data subjects regarding its use. Our clients may use relevant sections of this Privacy Statement or refer data subjects to this Privacy Statement if they consider it appropriate to do so.

The categories of personal data processed by us in relation to the services we provide are numerous and it is not possible to provide an exhaustive list. However, they may include:

- personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
- date of birth;
- gender;
- marital status and dependants;
- salary, annual leave, pension and benefits information;
- start date;
- location of employment or workplace;

- recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process);
- employment records (including job titles, work history, working hours, training records and professional memberships);
- compensation history;
- performance information;
- disciplinary and grievance information.
- CCTV footage and other information obtained through electronic means such as swipecard records;
- internal communications such as emails, text messages and messages sent via instant messaging systems and applications;
- information about use of information and communications systems; and
- photographs.

For certain services or activities, we may process special categories of personal data, including:

- information about race or ethnicity, religious beliefs, sexual orientation and political opinions;
- information about trade union membership;
- information about health, including any medical condition, health and sickness records; and
- information about criminal convictions and offences.

We operate a client relationship management database which includes details of individual contacts employed by our current, former and prospective clients together with other professional contacts we have. The information we hold includes individual contact details, details of our interactions, past work and work opportunities and any other information relevant to our relationship. This information is processed for our legitimate business purposes of marketing our services to interested persons, operating our business and managing our client and other external relationships. We do not systematically share marketing information with third parties.

### **Use of personal information**

We use personal data for the purposes set out below.

#### Providing professional services

We provide a range of professional services. Some of our services require us to process personal data in order to provide carry out our contractual obligations.

**Legal grounds: Legitimate interests, legal obligation, public interest or consent**

This processing of personal information by us is necessary for the purposes of the legitimate interests pursued by us in providing professional services and our client in receiving professional services as part of running their organisation. Where we process special categories of personal data, we rely on a relevant public interest condition or consent.

Administering, managing and developing our businesses and services

We may process personal data in order to run our business, including:

- managing our relationship with clients and prospective clients;
- developing our businesses and services (such as identifying client needs and improvements in service delivery);
- maintaining and using IT systems;
- hosting or facilitating the hosting of events; and
- administering and managing our website and systems and applications.

**Legal grounds: Legitimate interests**

This processing is necessary for the purposes of the legitimate interests pursued by us to administer, manage and develop our business and services.

Security, quality and risk management activities

We have security measures in place to protect our and our clients' information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We monitor the services provided to clients for quality purposes, which may involve processing personal data stored on the relevant client file. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to client engagements. We collect and hold personal data as part of our client engagement and acceptance procedures.

**Legal grounds: Legitimate interests**

This processing is necessary for the purposes of the legitimate interests pursued by us to ensure network and information security, manage risks to our business and check the quality of our services.

Providing our clients and prospective clients with information about us and our range of services

Unless we are asked not to, we use client and prospective client business contact details to provide information that we think will be of interest about us and our services.

For example, industry updates and insights, other services that may be relevant and invites to events.

**Legal grounds: Legitimate interests**

This processing is necessary for the purposes of the legitimate interests pursued by us to promote our business and services.

Complying with any requirement of law, regulation or a professional body of which we are a member

As with any provider of professional services, we may be subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with any such obligations and those records may contain personal data.

**Legal grounds: Legal obligation or legitimate interests**

This processing is necessary for us to comply with a legal obligation and, where we do not have a legal obligation, we have a legitimate interest in processing personal data as necessary to meet our regulatory or professional obligations.

Other business-related purposes

We are continually looking for ways to help our clients and improve our business and services. Where agreed with our clients, we may use information that we receive in the course of providing professional services for other lawful purposes, including analysis to better understand a particular issue, industry or sector, provide insights back to our clients, to improve our business, service delivery and offerings and to develop new Ibx Gale technologies and offerings. To the extent that the information we receive in the course of providing professional services contains personal data, we will de-identify the data prior to using the information for these purposes.

**Legal grounds: Legitimate interests**

We have a legitimate interest in de-identifying data to help our clients, to improve our business, service delivery and offerings and to develop new ibex gale technologies and offerings, including by performing benchmarking and analysis.

**Data retention**

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation).

In the absence of specific legal, regulatory or contractual requirements, our baseline retention period for records and other documentary evidence created in the provision of services is 6 years.

Personal data may be held for longer periods where extended retention periods are required by law or regulation and in order to establish, exercise or defend our legal rights.

### **When and how we share personal data and locations of processing**

Throughout our collaboration with you or your organisation, we utilise specific third-party technology services to enhance our work. These services, which may include word processing and meeting software provided by Microsoft and communication services for improved collaboration and coordination, are essential for efficient operations. Additionally, we employ various ancillary services, such as in person and AI note-taking services.

To facilitate these services, your personal information may be stored in the cloud on infrastructure managed by the relevant service provider. However, our third-party providers are strictly prohibited from sharing or using this information for any purpose other than serving us. We adhere to applicable laws, providing additional notice and obtaining consent when sharing personal data.

There are instances where we must share your personal information with regulators, government agencies, enforcement bodies, courts, and other third parties.

Some of your personal information may be stored in a cloud located within or outside of the UK, the EEA or your own jurisdiction and managed by a third-party service provider. When this occurs we conduct thorough due diligence to ensure the security of third-party technology systems.

### **Confidentiality and security of your personal information**

We are committed to keeping the personal information provided to us secure and we will take reasonable precautions to protect personal information from loss, misuse or alteration.

We have implemented information security policies, rules and technical measures to protect the personal information that we have under our control from:

- unauthorised access;
- improper use or disclosure;
- unauthorised modification; and
- unlawful destruction or accidental loss.

All of our employees, workers, consultants and data processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with, the processing of personal information, are obliged to respect the confidentiality of the personal information of all individuals whose personal information we process in the course of providing our services.

### **How to access your information and your other rights?**

If we are the data controller in respect of your personal information, you have the following rights in relation to the personal information we hold about you. Please note that these rights are subject to certain exemptions which may be applicable to any request you make.

#### **Your right of access**

If you ask us, we'll confirm whether we're processing your personal information and, subject to any applicable exemptions, provide you with a copy of that personal information (along with certain other details) within the timescales or extended timescales provided for by the GDPR for complex requests, or where applicable, provide you with an explanation as to why we will not be complying with your request. If you require additional copies, we may need to charge a reasonable fee.

#### **Your right to rectification**

If the personal information we hold about you is inaccurate or incomplete, you're entitled to have it rectified. If you are entitled to rectification and if we've shared your personal information with others, we'll let them know about the rectification where possible and where this would not involve disproportionate effort. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

#### **Your right to erasure**

You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable because that was the legal basis on which we were processing your personal information). If you are entitled to erasure and if we've shared your personal information with others, we'll take reasonable steps to inform those others where possible and where this would not involve disproportionate effort. If you ask us, where it is possible and lawful for us to do

so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

### **Your right to restrict processing**

You can ask us to 'block' or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or you object to us processing your personal information. If you are entitled to restriction and if we've shared your personal information with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

### **Your right to data portability**

With effect from 25 May 2018, you have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine-readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

### **Your right to object**

You can ask us to stop processing your personal information, and we will do so, if we are:

- relying on our own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing; or
- processing your personal information for direct marketing.

### **Your rights in relation to automated decision-making and profiling**

You have the right not to be subject to a decision when it's based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for entering into, or the performance of, a contract between you and us.

### **Your right to withdraw consent**

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.





If you want to exercise any of these rights you can do so by contacting David Major at [dmajor@ibexgale.com](mailto:dmajor@ibexgale.com) who is our appointed Data Protection Officer.

**Your right to lodge a complaint with the supervisory authority:**

If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the Information Commissioner's Office (ICO). You can find details about how to do this on the ICO website at <https://ico.org.uk/concerns/> or by calling their office on 0303 123 1113.

**Changes to this Privacy Policy**

We may make changes to this Privacy Statement from time to time.

To ensure that you are always aware of how we use your personal information we will update this Privacy Statement from time to time to reflect any changes to our use of your personal information. We may also make changes as required to comply with changes in applicable law or regulatory requirements. We encourage you to review this Privacy Statement periodically to be informed of how we use your personal information.