



Privacy Policy

1 Introduction

This notice contains important information about your rights to data privacy and about our commitment to protecting those rights.

The Social Profit Calculator LTD Privacy Notice applies to all individuals ('data subjects') whose personal data is stored or used ('processed') by Social Profit Calculator (SPC).

SPC will endeavour to process your personal data lawfully at all times and in accordance with international best practice. In particular, we will comply with the European Union's General Data Protection Regulation (or GDPR).

SPC acts as a data 'controller', as defined by the GDPR. The 'main establishment' for SPC is located in the United Kingdom (address below). Therefore, the lead regulator (or 'supervisory authority') for SPC is the UK Information Commissioner's Office (or ICO).

2 Our Commitment to you

We will endeavour to process your personal data lawfully at all times, and in accordance with international best practice.

Furthermore, if you satisfy one of the following three criteria, your privacy will be protected by the EU's GDPR:

You are a citizen of the European Union, or

You are a resident of the European Union, or

Regardless of your citizenship or residency, you are a customer, supplier, partner (or any other type of stakeholder) of SPC.

If you satisfy the above criteria, Article 13 of the GDPR confers to you the following rights:

- Right to be informed about your data
- Right to access your data
- Right to rectify your data
- Right to erase your data
- Right to restrict the processing of your data
- Right to object to the processing of your data
- Right to data portability
- Right to complain to a supervisory authority within the European Union
- Rights related to automated decision making, including personal profiling.

In relation to the last of these rights, please note that SPC does not use any personal data for automated decision making or profiling.

These rights under GDPR are explained in greater detail by SPC's supervisory authority, the UK Information Commissioner's Office (details below). Another useful source of information is the European Union.

3 Legality of processing

Within the context of GDPR, SPC's lawful bases for processing personal data include the following:

- 1) Performance of a **contract** between parties

- 2) The performance of a **legal obligation**
- 3) The protection of **vital interests** (e.g. in a health emergency)
- 4) The exercise of our **legitimate interests** (described below).

These four lawful bases for processing personal data lie at the heart of our relationship with you and your data.

SPC's **legitimate interests** in the processing of personal data are concerned with the long-term sustainability and integrity of its commercial operations, involving:

- The need to deliver specialist consulting, analytical, training and software development services to customers world-wide, across both the public and private sectors.
- The need to build and maintain permanent and productive relationships with clients, suppliers, partners, employees and all other stakeholders;
- The need to improve our services, manage our risks, maintain accurate records and operate our business efficiently.

4 Purposes and legal bases

SPC uses personal data in many internal and commercial processes. These are listed in the following table, along with each activity's purpose and the applicable legal bases.

Process	Purpose	Legal Bases*			
		C	VI	LO	LI
Project management	Coordinating the delivery of services to clients using project methodologies	✓			✓
Business development	Informing prospective clients about the services offered; issuing proposals; building sustainable client relationships	✓			✓
Contact management	Maintenance of contact details, facilitating communications between employees, associates and all other stakeholders	✓		✓	✓
Resourcing services	Coordinating the recruitment, registration and remuneration of associates	✓		✓	✓
Travel management	Organising business travel for SPC staff and associates	✓	✓	✓	✓
Office administration	Performing all activities associated with administrative support for SPC's commercial operations	✓			✓
Company legal administration	Administering the legal requirements for registering companies			✓	✓
External auditing	Periodic visits from certified auditors with access to all data				✓
Corporate archiving	Secure storage of business records for extended periods in offsite locations	✓		✓	✓
Training services	Managing all information pertaining to the enrolment and performance of clients on training programmes	✓			✓
Financial management	Payments to suppliers of goods and services to SPC; billing clients for work completed	✓		✓	✓
Accident reporting	Administering the reporting of workplace incidents and injuries		✓	✓	✓
IT change management	Undertaking technical and administrative changes to IT systems in response to personnel changes	✓			✓
Employee HR management	Management and administration of the employee lifecycle	✓		✓	✓

* Legal Bases: Contract (C) Vital Interest (VI) Legal Obligation (LO) Legitimate Interest (LI)

5 Categories of data recipients

One or more of the following recipients may need to view or hold your personal data during the course of our lawful data processing activities:

- | | | |
|--------------------------|----------------------------|---|
| 1. Our employees | 8. Our payroll providers | 15. Our archivers |
| 2. Our associates | 9. Our insurance providers | 16. Your nominated referee(s) |
| 3. Our clients | 10. Our pension providers | 17. Our company registration authorities |
| 4. Our partners | 11. Our bank | 18. Embassies or consulates (visa applications) |
| 5. Our suppliers | 12. Your bank(s) | 19. Government regulators for data protection and health/safety monitoring. |
| 6. Our legal advisors | 13. Our tax authorities | |
| 7. Our external auditors | 14. Your tax authority | |

For your protection, access to personal data is granted on a 'need to know' basis.

6 Data safeguards

In order to protect the security of your data against loss, misuse, unauthorised access, disclosure or alteration, SPC maintains a range of technical and organisational security measures. These measures are regularly evaluated and improved.

Our digital infrastructure is protected using advanced security measures, including encryption. Where appropriate and feasible we may adopt techniques of anonymisation in order to hide or remove any information capable of identifying individual people.

7 Transfers outside the EU

As a supplier of specialist services worldwide, SPC maintains professional relationships both within and beyond the borders of the European Union. We may occasionally need to share personal data with non-European stakeholders, including our professional colleagues, but only where we can demonstrate a lawful basis for our actions.

8 Data retention

We will retain personal data for no less than the minimum timescales specified in law. Retention periods beyond these legal minimums will be influenced by our lawful bases for data processing (described above).

Our standard minimum retention period for data is 7 years, except where a shorter period has been mandated in law or by contractual terms agreed between us and individual clients. All personal data is subject to periodic (typically annual) reviews. It will then be maintained or erased in accordance with our obligations and legitimate interests.

9 Our supervisory authority for data privacy

SPC's supervisory authority for data privacy is the UK Information Commissioner's Office (ICO). You have the right to complain to the ICO, who may be contacted here:

Information Governance Department

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

United Kingdom

<https://ico.org.uk>

10 Further information

For further information, or to exercise your rights as a data subject, SPC's Data Protection Representative may be contacted here:

The Data Protection Representative

Social Profit Calculator Ltd

Carvers Warehouse

77 Dale Street

Manchester

M1 2HG

United Kingdom

Email: info@socialprofitcalculator.co.uk