

## OUR PRIVACY POLICY

This policy applies to all services provided by Millington Hingley Ltd, our social media platforms and website.

When we use the phrase '*personal data*' we mean identifiable information about you, such as your name, address, email, telephone number, bank account details, etc. If you cannot be identified from the data, for example, if your personal information has been anonymised, then this policy would not apply.

We will always let you know if we have significantly updated this policy and we would usually do this by email and will update our website.

### **Who are 'we'?**

When we use the term 'we', 'our' or 'us', we are referring to Millington Hingley Limited (company number 11260396). For European Union data protection purposes Millington Hingley Ltd is the data controller.

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

We would typically collect your personal data when you use our services i.e. we work with you; or you visit our website.

You may give your personal data to us directly, for example, if you fill in one of our contact forms, if you request information about the services that we offer (including training & events) or if you join us on social media. If you don't want to give us your personal information, you don't have to, but it might mean that you can't use some of our services. In some circumstances, not having your personal information could affect our ability to administer your account. If this applies in a particular situation, and we cannot do the work that you have asked us to do, we will discuss this with you to try to find a solution.

When you visit our website, or use our services, some information will be collected automatically e.g. your IP address and/or the type of device you are using. From time to time we look at this information to understand where our visitors are coming from and how they are using our website.

The majority of information that we have about you will come directly from you, but sometimes we might be provided with your personal data from other sources, such as publicly available materials or trusted third parties with whom we collaborate professionally. We may then use this information to supplement the personal data we already have, in order to improve our services and/or to conduct the work that we have been asked to do by you, or on your behalf.

We take your privacy seriously and will predominantly use your personal data, with your consent, to administer your account or to provide the products and services that you have requested from us or have been instructed on your behalf.

From time to time, we may use your personal data for other purposes, such as to communicate with you in accordance with your marketing preferences. For example to provide information that you've requested from us (such as training or education materials), send information to you regarding our services or another product or service that we think you might be interested in (such as operational and marketing communications). In relation to these types of communications, we will contact you in line with your stated preferences and you can ask us not

to send these to you at any time. You can 'opt out' by following the unsubscribe instructions contained in the marketing communication or you can send us your request in an email to [mail@millingtonhingley.co.uk](mailto:mail@millingtonhingley.co.uk).

There may be times when we need to share your personal data with external agencies and third parties. We will only disclose your personal data to administer the account that you have with us in order to provide professional services. We will not share, or sell, your data to third parties purely for marketing purposes. In some instances, we may be asked to share your personal data with regulatory or law enforcement bodies, government agencies or courts, or other third parties in order to comply with applicable laws or regulations, or to exercise, establish or defend our legal rights. Where possible and appropriate, we will notify you of this type of disclosure.

### **Security**

We are committed to protecting your personal data and have appropriate technical and organisational measures in place to make sure that happens. If you would like more information on this, please email us on [mail@millingtonhingley.co.uk](mailto:mail@millingtonhingley.co.uk).

### **Retention of your personal data**

The length of time that we keep your personal data depends on what it is and whether we have an ongoing business need to retain it. For example, we must retain case materials in accordance with the conditions set out in the NFFNG Exhibit Retention Guidance V1.0 & NPIA Exhibit Retention Guidance (V1.0) 2012. There may be other reasons that allow us to provide you with the service that you've requested.

We will only retain your personal data for as long as we have a relationship with you and for a period of time afterwards where we have an ongoing business need to retain it and/or to comply with applicable legal, tax or accounting requirements. Following that period, we will make sure it is deleted or anonymised.

### **Your rights in respect of the personal data that we retain**

You have a right of access, under data protection legislation, to the personal data that we hold about you. This includes knowing what personal data we have and to make sure it's correct and up to date. You can request a copy of your personal data, ask us to restrict or stop processing your personal data or ask us to delete it (subject to the provisions outlined above) at any time by sending us an email to [mail@millingtonhingley.co.uk](mailto:mail@millingtonhingley.co.uk).

If you are not happy with how we are processing your personal data, please let us know by sending us an email to [mail@millingtonhingley.co.uk](mailto:mail@millingtonhingley.co.uk). We will investigate your complaint in line with our feedback procedure as outlined in our Terms and Conditions. If you are not satisfied with how we have dealt with your complaint you can also contact your local data protection authority who will be able to advise you further.

Wherever possible we try to operate a paperless office and so we do prefer to communicate with you by email. However, if you have asked us to contact you in a different way, we will. If you prefer to contact us by telephone or post, our contact details can be found on our website: [www.millingtonhingley.co.uk](http://www.millingtonhingley.co.uk).

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