

## Data Privacy Notice

Version 9:2025

In compliance with GDPR (General Data Protection Regulation)

*Compass Connections* is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance to the General Data Protection Regulation. It applies to all clients.

### 1. What's this all about?

From 25 May 2018 the processing of personal data is to be governed by the EU General Data Protection Regulation (GDPR). 'Processing' here includes the collection, recording, and use of personal data, whether by manual or electronic means, and the privacy and any dissemination of that information.

'Personal data' is defined as such data relating to a living individual who can be identified from that data. Identification can be by the personal data alone, or in conjunction with any other information in the data controller's possession or likely to come into such possession.

### 2. Who's who in this case?

*Compass Connections* is the data controller in this instance. You are the data subject. This means that *Compass Connections* is responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former clients. This notice does not form part of any contract to provide services. We may update this notice at any time.

### 3. What are the 'Data Protection Principles'?

We will comply with Data Protection Law. This says that the personal information we hold about you must be:

- a) Used lawfully.
- b) Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- c) Relevant to the purposes we have told you about and limited only to those purposes.
- d) Accurate and up to date
- e) Kept only as long as necessary for the purposes we have told you about.
- f) Kept securely

### 4. What information do we hold?

Personal data means any information about an individual from which that person can be identified. It does not include data where the identify has been removed. We collect, store and use the following personal information about you:

- a) Name, telephone numbers and email addresses

## 5. How is your personal information collected?

We collect personal information about clients through the application of our services.

## 6. How will we use information about you?

We will only use your personal information when the law allows us to. Most commonly, we will use your information in the following circumstances:

- a) Where we need to perform the contract, we have entered into with you.
- b) Where we need to comply with a legal obligation

## 7. What happens if you fail to provide personal information?

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you or may be prevented from complying with our legal obligations.

## 8. How will we share your information?

We may have to share your data with third parties, including third party service providers and other entities in the group.

We require third parties to respect the security of your data and treat it in accordance with the law.

We may transfer your personal data outside of the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

## 9. Which third party service providers process my personal information?

'Third parties' includes third-party service providers.

The following third-party service providers process data about you for the following purposes:

- a) Microsoft Outlook – United States regarding email communications – for the email correspondence between clients and *Compass Connections* at [maria@compassconnections.co.uk](mailto:maria@compassconnections.co.uk)
- b) EE Mobile Network (part of the BT Group) - for the telephone and text messaging correspondence between clients and *Compass Connections*
- c) one.com - United States regarding website communications from [www.compassconnections.co.uk](http://www.compassconnections.co.uk)
- d) Starling Bank – regarding fees paid into our Compass Connections Bank account Starling Bank is registered in England and Wales as Starling Bank Limited (No. 09092149), London EC2M 2PP. [www.starlingbank.com/legal/privacy-notice/](http://www.starlingbank.com/legal/privacy-notice/)
- e) Social Media accounts – Instagram, X (Formerly Twitter) and Facebook. Regarding sharing of creative images

## 10. How secure is my information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal data in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specific purposes and in accordance with our instruction.

## 11. When might you share my personal information with other entities?

*Compass Connections* will not share your personal information with other third-party entities.

## 12. Why will you transfer information outside the EU?

We will transfer the personal information we collect about you to the following country outside the EU in order to perform our contract with you:

- a) Microsoft Outlook – United States regarding email communications – for the email correspondence between clients and *Compass Connections* at [maria@compassconnections.co.uk](mailto:maria@compassconnections.co.uk)
- b) EE Mobile Network (part of the BT Group) - for the telephone and text messaging correspondence between clients and *Compass Connections*
- c) one.com - United States regarding website communications from [www.compassconnections.co.uk](http://www.compassconnections.co.uk)
- d) Starling Bank – regarding fees paid into our Compass Connections Bank account Starling Bank is registered in England and Wales as Starling Bank Limited (No. 09092149), London EC2M 2PP. [www.starlingbank.com/legal/privacy-notice/](http://www.starlingbank.com/legal/privacy-notice/)
- e) Social Media accounts – Instagram, Twitter and Facebook. Regarding sharing of creative images

There **is** an adequacy decision by the European Commission in respect of the **United States**. This means that the U.S. to which we transfer your data **is deemed** to provide an adequate level of protection for your personal information. [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)

## 13. How will you manage Data Security?

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

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

In addition, we limit access to your personal information to those who have a contractual obligation to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures are available upon request.

We have put in place procedures to deal with any data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## 14. What about Data Retention?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including the purposes of satisfying any legal, accounting or reporting requirements. Detail of retention periods for different aspects of your personal information is available in our 'Retention' section as part of our Data Protection Policy. 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 requirements.

In some circumstances, we may anonymize your personal information so that it can no longer be associated with you, in which case we may use such further information without further notice to you. Once you are no longer a client of the company, we will retain and securely destroy your personal information in accordance with our data retention policy and applicable laws and regulations.

## 15. What is your duty to inform of changes?

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your client relationship with us.

## 16. What are your rights in connection with personal information?

Under certain circumstances, by law you have the right to:

- a) Request access to your personal information commonly known as a 'data subject access request'. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- b) Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- c) Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below)
- d) Object to processing of your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.
- e) Request the restriction of processing of your personal information. This enable you to ask us to suspend the processing of personal information about you
- f) Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer at *Compass Connections* in writing.

## 17. Do I have to pay a fee?

You will not have to pay a fee to access your personal information. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need you to request specific information from you to help us confirm your identity and ensure your right to access the information. This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## 18. How can I withdraw consent?

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

To withdraw from consent, please contact the Data Protection Officer at *Compass Connections* in writing. Once we have received this notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agree to, unless we have another legitimate basis for doing so in law.

## 19. What about any change to this privacy notice?

We reserve the right to update this privacy notice at any time and will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

## 20. What if I have any queries?

If you have any questions about this privacy notice, please contact the Data Protection Officer at *Compass Connections*.

You can also contact the 'Information Commissioners Office' on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.



### REPLY FORM

## Data Privacy Notice

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I acknowledge that I have received and read the **Compass Connections Data Privacy Notice** – (Version 9:2025) and that I have read and understood it.

Name : \_\_\_\_\_

School / Organisation : \_\_\_\_\_

Role : \_\_\_\_\_

Contact email : \_\_\_\_\_

Signature : \_\_\_\_\_

Date : \_\_\_\_\_

Please return this reply slip and keep a copy for your records