



Privacy Policy

XCD HR Limited

Document Control

Document Name	Privacy Policy
Version Date	V0.5
Status	APPROVED
Classification	Restricted
Document Author	Chris Mitford-Slade (CMS)
Approved By	Simon Fowler (SRF)
Next Review Date	January 2022

Version Control

Changes to the organisation, business processes, information processing facilities and systems that affect information security shall be controlled. All policies and standards should be aligned with no conflicting information. A review and any necessary update to this document should be conducted at least annually.

Version	Date	Comments and Amendments	Updated By
0.1	26/07/2018	Approved	CMS
0.2	27/09/2018	Marketing Approved	RM
0.3	18/01/2019	CEO Review and comments - Approved	SRF
0.4	23/01/2020	CEO Review - Approved	SRF
0.5	27/01/2021	CEO Review - Approved	SRF

Table of Contents

1.	Introduction.....	3
2.	Purpose.....	3
3.	How we collect your personal data and information.....	3
4.	Using your personal data and information.....	3
5.	Recruitment.....	4
6.	Cookies.....	4
7.	Non-disclosure to Third Parties.....	4
8.	International transfers.....	4
9.	Security.....	5
10.	Other sites.....	5
11.	Data retention.....	5
12.	Your rights.....	5
13.	Acceptance.....	5

1. Introduction

XCD takes the privacy and security of your personal information very seriously, and we're committed to protecting and respecting your privacy. This policy will help you understand how we collect, process and protect your personal data.

This policy refers to all personal data gathered from individuals, companies and organisations during the course of its normal business activities. The Privacy Policy on personal data held on Employees and consultants is covered in a separate policy "Privacy Policy (internal)".

2. Purpose

XCD will collect personal data for the purposes of providing our software and services to prospects and clients. XCD is the data 'Controller' for any personal data that you provide to us. XCD will process your personal data in line with all applicable laws including the General Data Protection Regulations (GDPR). The contact details for XCD and its Data Protection Officer can be found at the bottom of this notice.

3. Collecting your personal data and information

XCD will collect and process your information in these scenarios:

- a. When you give us personal information by phone, email, mail and via our website. XCD operates a paperless office environment and all personal data will be stored electronically. Personal data will be held and managed in accordance with the XCD Information Security and Privacy Policy.
- b. When you visit our website. When you visit our website we automatically collect information which includes: the Internet Protocol (IP) address used to connect your computer to the internet, your login information, your geographic location, your browser and browser plug-in type and version, and your operating system and platform. We also collect information about your visit, including the source of your visit, chat-bot engagements, and the full click path and mouse movement through our sites (including date and time). This includes the services you viewed, searches you made on our sites, page response times, download errors, length of visits to certain pages, page interaction information (such as page scrolling, mouse clicks, mouse movements and keyed text), and how you navigated away from any page and any phonenummer you use to call our Helpdesk. We collect this type of information using a website recording service.
- c. Events and conferences. XCD will collect personal information during events and conferences.
- d. Partners and third-party service providers. XCD will only share information with partners and third-party service providers where it is required for the provision of our services.

4. Using your personal data and information

Your personal data and information may be used within XCD offices, departments and by authorised data 'Processors' for the purpose of supporting the services we offer to you. Our staff and authorised data 'Processors' will only use your information to the extent needed to perform their business functions.

XCD may disclose personal data and information if it is required to do so by law, Court order or for the prevention of fraud or crime or if we believe it is necessary to defend the rights, property or personal safety of the XCD website or its visitors.



5. Recruitment

On-line applications and CVs can be submitted via the XCD website. Applicants will be required to provide their consent via a “checkbox” in order to submit their application. Applications and CVs sent voluntarily by email or letter will be deemed to have been given with consent by the applicant. Although this does not form part of any initial contract with us, this and other relevant personal data that you provide or that we ask you for is a necessary step prior to entering into any future contract with XCD. No decisions will be made solely by automated decision-making (including profiling). Applicant data will be held for 18 months from the data of submission.

6. Cookies

Whilst you are using this website we may use cookies and collect other information (such as IP addresses) regarding your browsing activity. This information is used for internal purposes only and is used to assist us in evaluating, developing and improving this website. We do not use this information to attempt to find out the identities of those using our website.

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently to improve the user experience, as well as to provide information to the owners of the site.

Two types of cookies may be used on this site; 'session cookies' and 'persistent cookies'. Session cookies are temporary cookies that remain in your browser until you have exited the website. Persistent cookies will remain in your browser for a longer period of time. This website makes use of cookies to monitor visitor sessions. No personal data is stored in the cookie that is issued by this site. The value stored in the cookie is an anonymous identifier, which is not linked to any other personal data or information you may give us during your visit.

If you do not wish to receive these cookies you can disable them in your browser, but in doing so it may affect the functionality of our website. Most web browsers allow some control of cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org.

[You can read more about how we use cookies in our Cookie Policy.](#)

7. Non-disclosure to Third Parties

XCD does not supply your information to third parties but may use your personal data for marketing and other purposes upon download or subscription of services via the XCD website. You can at any time change your subscriptions and opt-out of receiving information from XCD by contacting us through any of the channels provided by this website, or clicking the Unsubscribe link in one of our emails.

8. International transfers

Your personal data may be processed outside of the EEA and in such cases, XCD ensures that any such processing only takes place under contract with the correct security and compliance measures in place to ensure that your privacy and data protection rights continue to be protected.

9. Security

We apply appropriate security controls to the access, use and storage of the data that you provide to us. This is evidenced by our achievement of certification to recognised security standards and our use of external providers to validate our controls.

10. Other sites

This website may contain links to other third-party websites. These third-party websites are not owned or controlled by XCD and we do accept no responsibility for their content, their privacy policies or how they treat information obtained from their users.

11. Data retention

We will retain your personal data for as long as it is necessary for any contract you hold with XCD or until you unsubscribe from any notifications you have been receiving. Should you unsubscribe from any email communications from XCD, your email address will remain on our system in a suppression list, which is used to 'suppress' future email messages to that email address. Once any personal data is no longer needed, it may be fully anonymised and used for analytical purposes.

12. Your rights

Subject to some legal exceptions, you have a right to request a copy of the personal data and information that that we hold and process about you. Similarly, you also have other rights in relation to rectification, erasure, restriction, data portability, objections and automated decision making. If you would like a copy of some or all of your personal data or wish to exercise or discuss your other rights then please contact the XCD Data Protection Officer using the contact details at the bottom of this page.

You have the right to complain to XCD about the way your personal data and information is processed. Please contact the XCD Data Protection Officer using the contact details at the bottom of the page. If you remain dissatisfied, then you may also complain to the Information Commissioners Office. They can be contacted at:

Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
www.ico.org.uk

13. Acceptance

This Privacy Policy was last updated in January 2021.

By using the XCD website, you agree to the collection and use of your personal data and information as set out in this Privacy Policy. If we change this Privacy Policy in any way, these changes will be posted here.

Please email any questions, concerns or comments you have about this policy to: XCD HR Ltd, 29 St Augustine's Parade, Bristol BS1 4UL. Email: info@peoplexcd.com. The Data Protection Officer may be contacted directly by sending an email to dpo@peoplexcd.com.

