

Privacy Statements and Privacy Notice

Version V2.1

Version Control

Version Number	Date of Change	Change Author
V1.0	8-12-2021	Mark Bidwell
V2.0	23-2-2022	Simon Ghent
V2.1	12-04-2022	Mark Bidwell

Change Statement

The person named below has responsibility of updating and enforcing the Privacy Statements and Privacy Policy.

If you would like to make any suggestions on how this plan can be improved or changes you would like to make to the plan then please contact the following person:

Name: Mark Bidwell

References

Bidwell Henderson Costs Consultant Ltd views security and privacy as integral to the function of the business. This commitment ensures compliance with the General Data Privacy Regulations. Keeping our staff informed and policies enforced is a crucial aspect to this commitment.

Privacy Statements

Bidwell Henderson Limited is part of Frenkel Topping Group. This privacy notice explains how we use any personal information we collect about you and your clients. This information notice is to explain our obligations to you under Data Protection legislation. We need to keep you informed about the information we collect about you and how we keep it safe when carrying out our services.

Cookie Banner:

Information relating to usage of our website is collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information. We will use your information collected from the website to personalise your repeat visits to the site.

We use cookies to track visitor use of the website and to compile statistical reports on website activity.

For further information visit <http://www.allaboutcookies.org/>

You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

Website Contact Form:

If you want to contact us using this form the information you provide will only be used to contact you to discuss your enquiry. Your personal information will be properly safeguarded and processed in accordance with our Privacy Policy (<https://bidwellhenderson.co.uk/privacy-policy>) at all times.

Services Agreement/Sales Order Example:

We aim to be completely transparent in the way we handle your personal data. When you sign up to our Services, we need to process your information for the purposes of fulfilling this agreement. Your personal information will be properly safeguarded and processed in accordance with our Privacy Policy. Please refer to our Privacy Policy (<https://bidwellhenderson.co.uk/privacy-policy>) for details of what we hold, how we use it and how long we retain it.

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1. Statement:

Bidwell Henderson Costs Consultant Ltd is part of Frenkel Topping Group. We believe your data is a precious commodity and know it is your right to total transparency and control on how we use it. We have implemented strong data privacy and security safeguards to ensure that you're protected to the best extent we can.

This policy outlines what data we collect, how we use it and the safeguards we put in place to protect it.

Contact us at admin@bidwellhenderson.co.uk if you have any concerns or wish to uphold your rights.

2. Our Promises:

- We will only collect data about you that is relevant and necessary
- Your data will only be held on systems that meet compliance standards.
- Your data will only be accessed by those who need it and we will minimise the amount of data that is processed, wherever possible

- We won't share or sell your data to any third party outside of Bidwell Henderson Costs Consultant Ltd and our parent company Frenkel Topping Group plc unless you have agreed through explicit consent, we are required to share it by law or we need to fulfil our service commitments to you through a third party that meets our own privacy standards
- We will always remember that it is your personal data, not ours. As such we will ensure complete transparency and openness with you
- We respect your rights as outlined in the next section and will respond to all requests promptly
- We will not transfer or process your data in any Third Country without informing you and ensuring the same levels of data protection we enforce are in place.

3. Your Rights:

You have the following rights over any data Bidwell Henderson Costs Consultant Ltd holds about you:

- ✓ Right to object to processing at any time
- ✓ Right to opt out of marketing at any time
- ✓ Right to have inaccurate data corrected
- ✓ Right to erasure of personal data from our database (unless we're legally obliged to keep it)
- ✓ Right to export of personal data

If you would like to exercise these rights please contact us at admin@bidwellhenderson.co.uk.

4. How we collect your data:

We collect information about you in three key ways:

- Passive – you give us information on our website, email us, call us, meet one of us at events or meetings or approach us on social media
- Proactive – this is data about you that we may hold from referrals, resellers or proactive marketing activity
- Reactive – Our main business activity is as a Processor for our clients. As such we will be passed personal data in the course of fulfilling our contracts.

We may use automated analytics and tracking systems for email, document management and marketing activities so that we can protect and optimise our service and deliver relevant marketing.

We try and minimise the personal data held on you. Typically, this is restricted to:

- **Your personal contact details** – email address, phone numbers, business related social media page such as LinkedIn, source of your data and legal reason for the holding of your information
- **Your company details** – as above but also address, website and other public held information including credit rating and invoicing details if relevant
- **Transmitted information** – such as emails, texts, messaging, phone call information and recordings, voice mails, email, meeting notes and document tracking information
- **Case Matters** – This is information we hold as a Processor related to legal matters that require our services and may include personal data your Solicitor or Barrister may have compiled as part of the matter.

We make it policy not to connect any social media feeds or store any social media you may post to our systems, except for private messages.

Why do we need to collect and use your personal data?

The primary legal basis that we process your data is for the fulfilment of Contract. The information that we collect is essential for us to be able to carry out the services that you require from us effectively.

Data gained from marketing our services or other business activities shall be processed for our Legitimate Interests.

Every email sent from Bidwell Henderson Costs Consultant Ltd allows you to opt out of receiving marketing emails from us, except for the purposes of fulfilling any contractual arrangements.

How will we use the information about you?

We process information about you in order to provide you with the services for which you or your solicitor engages us.

If we believe you will benefit from our services we may use your data to market to you if you have consented us to or if we believe we have a legitimate interest in doing so, fulfil contractual arrangements or for other agreed purposes. Calls may be recorded for information holding, quality and training purposes. Our email, document management and website analytics are used for information purposes and to track breaches of copyright. All our processes are mapped and are subject to various internal policies to ensure that your data privacy and security.

5. How we Process your Data:

Data is processed on encrypted systems on-premise and on hosted cloud services such as Microsoft Office 365. A list of these systems can be provided on request.

As such, data is processed wherever possible in the UK or EU. In some cases we may need to process data held on US based servers.

We use the following safeguards with respect to data transferred outside the UK and European Union:

- the data protection clauses in our contracts with data processors include transfer clauses written by or approved by a supervisory authority in the United Kingdom or the European Union;
- We comply with a code of conduct approved by the United Kingdom supervisory authority and where adequacy decisions are in operation;
- We carry out best endeavours where cloud providers do not allow individual contracts or Standard Contractual Clauses (for example Microsoft) and duly note the guidance issued by Schrems II

6. Sharing Data:

We will never share or sell your personal data for marketing purposes.

Where you have consented to receiving information regarding other products and services from Frenkel Topping Group plc and other firms within the group, your data will be shared with other firms in the Group for this purpose and contact details stored on a Group Client Management System (CRM). The Group CRM will be operated by Frenkel Topping Group

plc. A copy of their Privacy Policy can be found on www.frenkeltoppinggroup.co.uk You can withdraw consent at any time and your data will be removed.

We will only share information where agents, resellers or suppliers are involved in the delivery of your service. In such cases we will first try and anonymise the data, or minimise it to the fullest extent possible.

Where third parties are involved in processing your data, we will have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they will only act in accordance with our written instructions.

Where it is necessary for your personal data to be forwarded to a third party, we will use appropriate security measures to protect your personal data in transit such as password protection and/or encryption of data.

Our website and other materials sent to you may contain links to other third party websites. We're not responsible for the content or your data privacy on these sites.

7. Retention

Our data retention policy is as follows:

- 12 months for any prospect marketing data unless responded to by the data subject in which case 12 months from the last contact
- 72 months following the end of any Service Agreement with a client
- 36 months for all supplier, reseller or other contacts not covered above from point of last contact

All the above are carried out during the nearest data review which are typically carried out annually in May.

8. Cookies:

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For further information visit <http://www.allaboutcookies.org/>

You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

Please see the Cookie Policy on our website for further information www.bidwellhenderson.co.uk

9. Upholding your Rights

How can I access the information you hold about me?

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please email admin@bidwellhenderson.co.uk or write to us at 1 Lea Bank, Broadmeadows, South Normanton, Alfreton, Derbyshire, DE55 3LH.

We have an obligation to ensure that your personal information is accurate and up to date. Please ask us to correct or remove any information that you think is incorrect. Please also contact us if there are changes to your client's personal data so that it remains up to date.

If you request for your data to be deleted, your name and email address will be added to an exceptions list and all other data removed.

What can you do if you are unhappy with how your personal data is processed?

You also have a right to lodge a complaint with the supervisory authority for data protection. In the UK this is:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire,
SK9 5AF. Telephone 0303 123 1113 (local rate).

This Privacy Policy is reviewed on a regular basis and was last reviewed on 23rd February 2022.