

# ct & ess Privacy Policy

Last reviewed 25 July 2024



## 1. Introduction

This Privacy Policy sets out how ct & ess uses and protects any information that you give us when you interact with us.

ct & ess is committed to ensuring that your privacy is protected. If you provide us with personal information you can be assured that it will only be used in accordance with this Privacy Policy.

ct & ess may change this policy from time to time by updating this page.

## 2. Legitimate interest

You may have chosen to have your personal information added to, or been added to, our contact database for marketing purposes. We will only use your information if it serves our legitimate interest in maintaining contact with you.

We will specifically ask you to opt in to remain on our database should you be contacted for marketing purposes.

## 3. Third parties

You may have chosen to provide your details to a third party lead generation company. We may buy marketing lists but we only do so from reputable agencies who operate suppression lists.

You can update your subscription preferences or unsubscribe from our marketing emails at any time by clicking the links at the bottom of every email we send you. If you want more information you can also contact us by email at [data@ctandess.com](mailto:data@ctandess.com).

## 4. General use of our website

When using our website, we collect basic information about your usage of our website, such as the pages you visit and length of time you spend on the website. We may also collect your IP address which tells us how you are accessing our website, including location and device information.

We ask for basic contact information if you submit an enquiry to us using the 'Say hello' form.

## **5. Making an enquiry**

Should you use the 'Say hello' form on our website or call us on the telephone, we may collect your personal information such as name, telephone number, email address, the company you work for and some optional information about the nature of your inquiry.

Should you send an inquiry directly to [hello@ctandess.com](mailto:hello@ctandess.com) we will only collect your email address and the information that you decide to include in the body text of the email that you send.

## **6. What we do with the information we gather**

If you submit your email address into the 'Say hello' form on our website, your email address is added to our CRM platform. We will ask you to opt in to any marketing communications.

Once we have your consent, we may send you emails from time to time with news, product information, promotions, invitations to events and other information that we think you may find interesting.

Should we have your consent, from time to time, we may also use your information to contact you for market research purposes. We may use the information to customise the website according to your interests.

You can update your subscription preferences or unsubscribe from our marketing emails at any time by clicking the links at the bottom of every marketing email we send you or by emailing us at [data@ctandess.com](mailto:data@ctandess.com).

We retain your contact information until you become a client and indefinitely thereafter, unless you request that it is removed from our records. Periodically, we delete contact data considered to be unnecessary or out of date.

## **7. Data security**

We are committed to ensuring that your information is kept securely. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

You may request our Information Security Policy by emailing [data@ctandess.com](mailto:data@ctandess.com).

## **8. Data security in apps**

When you use our applications, we may collect certain information in addition to information described elsewhere in this policy. For example, we may collect information about the type of device and operating system you use. We may ask you if you want to receive push notifications about activity in your account. If you have opted in to these notifications and no longer want to receive them, you may turn them off through your operating system. We may ask for access or track location-based information from your mobile device after downloading or using our Mobile Apps or Services - we will always explicitly notify you to opt in to this feature.

We may use mobile analytics software to better understand how people use our application. We may collect information about how often you use the application and other performance data.

## **9. Links to other websites**

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Privacy Policy.

## **10. Notice of a security breach**

If a security breach causes an unauthorised intrusion into our system that materially affects your data, then we will notify you as soon as possible and later report the action we took in response.

In the event of a data breach, we will invoke our Data Breach Incident Response Plan.

## **11. Controlling your personal information**

If you have previously agreed to us using your personal information for marketing communication purposes, you may change your mind at any time by unsubscribing or updating your preferences. You can do this by clicking the links at the bottom of every email we send you or emailing us at [data@ctandess.com](mailto:data@ctandess.com).

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.

In the event of any cross border transfer of personal data approved by ct & ess, to the extent that any transfer is outside of a jurisdiction deemed to have an adequate level of protection for personal data by competent data protection authorities including the European Economic Area (EEA), Andorra, Argentina, Canada, Faroe Islands, Guernsey, Israel, Isle of Man, Jersey, Japan, New Zealand, Switzerland, Uruguay and such other countries notified in writing by ct & ess (Adequate Countries), the respective parties shall be bound by the following transfer mechanisms: In the context of transfers from the EEA and/or the United Kingdom, the Standard Contractual Clauses pursuant to the Commission Implementing Decision (EU) 2021/914 of 4 June 2021 on standard contractual clauses for the transfer of Personal Information to third countries pursuant to Regulation (EU) 2016/679 (GDPR) of the European Parliament and of the Council, as may be amended, updated or replaced from time to time (Standard Contractual Clauses) and/or in the context of transfers from other jurisdictions, the policies available on our website, may be amended, updated or replaced from time to time.

You may request details of personal information which we hold about you under the UK General Data Protection Regulation.

If you have any questions about this Privacy Policy or believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible.

If you contact us to ask for the personal data we store about you, we will acknowledge the request within 3 working days and aim to resolve it within a further 7 working days.

If you ask us to delete your data we will acknowledge your request within 3 working days and action your request within a further 7 working days.

Your data will be finally and completely deleted from all our systems (internal and external, online and offline) within a maximum of 90 days.

We reserve the right to amend or modify this Privacy Policy at any time and in response to changes in applicable law. If we change our Privacy Policy we will post the changes on this page, and may place notices on other pages of our website, so that you are aware of any amendments.

Employee with overall responsibility for this Privacy Policy: John Phelan, Managing Director [john.phelan@ctandess.com](mailto:john.phelan@ctandess.com).

## **12. Children's privacy**

Our site and services are not intended for, nor marketed or directed toward, children under the age of 18 and we do not knowingly collect personal information from children under 18 years of age.

If you believe your child may have provided us with personal information without your consent, you may alert us at [data@ctandess.com](mailto:data@ctandess.com) and we will promptly take steps to delete such information as laid out in the clause above titled 'Controlling your personal data.'