

Client Privacy Notice

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1. Introduction

First Intuition is committed to respecting your privacy. This notice explains how we comply with the law on data protection, what your rights are, and how we may use the personal information we collect before, during and after your relationship with us as a client.

First Intuition will be the data controller of any of your personal information as defined in Article 4(7) of the UK GDPR. This notice applies to our current and former clients. This notice does not form part of any contract and is for informational purposes only. References to "FI", "we," "our" or "us" in this privacy notice are to First Intuition.

2. Contact Details

First Intuition's Data Protection Officer oversees our compliance with data protection legislation. Our ICO registration number is ZA057033.

Our contact details are the following:

Telephone: 0207 323 9636

Email: dpo@firstintuition.co.uk

Postal Address: County House, Conway Mews, London. W1T 6AA.

3. Personal Data

When you interact with FI in relation to your relationship with us as a client, you may provide us with, or we may obtain, personal data about you.

We typically collect personal data about clients through the client onboarding and relationship management processes.

If you are providing us with details of your employees, they have a right to know and to be aware of what personal information we hold about them, how we collect it, how we use it, and how we may share that information. Please share this notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the "Your Rights In Relation To This Processing" section below and our Students Privacy Notice.

4. Data Collected, Processing Purposes, Lawful Bases, Data Sharing, and Retention Periods

Depending on the processing activity, we may rely on one or more of the following lawful bases for processing your personal data under the UK GDPR:

- Article 6(1)(a) which is where you have given us your consent to process your personal data.
- Article 6(1)(b) which relates to processing necessary for the performance of a contract.
- Article 6(1)(d) in order to protect your vital interests or those of another person.
- Article 6(1)(e) for the performance of our public task.
- Article 6(1)(f) for the purposes of our legitimate interest.

The table below describes the main purposes for which we process your personal data, the categories of your information involved, and our lawful bases for being able to do this. It also includes the types of organisations we share your personal data with and how long we keep your personal data.

Data Collected	Purpose	Lawful Basis	Data Sharing	Retention Period
Full name, Business email address, Business address, Telephone/mobile number, Employee number, Interview notes	Client Management	<ul style="list-style-type: none"> Legitimate Interest 	<ul style="list-style-type: none"> Employees Suppliers / service providers 	6-years after end of contract
Biometric data (CCTV, photos)	Crime prevention and detection	<ul style="list-style-type: none"> Legitimate interests 	<ul style="list-style-type: none"> Employees Suppliers / service providers 	30-days or longer if there is an incident

When we rely on the lawful basis of legitimate interest to process your personal data, we must tell you what these legitimate interests are. The legitimate interests we rely on are as follows:

- In relation to our contract with your organisation.
- In relation to sending marketing messages to you.
- In relation to crime detection and prevention.

Where you have given us your consent to use your personal information, you have the right to withdraw this consent at any time. You may do this by contacting us as described in the "Contact Details" section above.

Please note that the withdrawal of your consent will not affect any use of the data undertaken before consent is withdrawn, and we may still be entitled to hold and process relevant personal information on bases other than consent. Withdrawing consent may also have the same effects as not providing the information at all, for example, we may no longer be able to provide certain services to you.

In some cases, you will have a legal, contractual, or other, requirement or obligation to provide us with your personal information. If you do not provide us with the requested personal information, we may not be able to properly perform our contract with you or comply with legal obligations. In cases where you are not under obligation to provide such information, failing to provide it may still mean we are not able to properly perform our contract with you.

5. Recipients of Personal Data and International Transfers

FI is required to transfer the personal information provided by its service users to third parties to fulfil contractual obligations.

Where necessary, we may transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place.

Where necessary, our data processors may share personal information outside of the UK. When doing so, they comply with the UK GDPR, making sure appropriate safeguards are in place.

Appropriate safeguards for international transfers are:

- Adequacy decisions
- International Data Transfer Agreements (IDTA)
- Standard Contractual Clauses (SCC)

Please contact us using the details found in the “Contact Details” section for more information on our use of international transfers.

The following are categories of recipients that service user information could be transferred to:

Data Processor	Nature of Processing	Categories of Personal Data	Location of Data	Security Measures	Transfer Safeguard
Microsoft 365	Office productivity apps	Personal data is contained in office apps created by employees and stored in applicable cloud products.	UK	Microsoft compliance	n/a
Barracuda Networks	Backup	Personal data contained in Microsoft office apps created by employees and stored in applicable cloud products.	UK	Barracuda Security, Compliance & Data Privacy	n/a

In some circumstances, such as under a court order, we are legally obliged to share information. We may also share information about you with third parties including government agencies and external auditors. For example, we may share information about you with ESFA to claim funding.

6. Your Rights In Relation To This Processing

As an individual, you have certain rights regarding our processing of your personal data, including a right to lodge a complaint with the Information Commissioner as the relevant supervisory authority.

Some of these rights are ‘absolute rights’, meaning you can exercise these rights as and when you like. Others are ‘qualified rights’, meaning certain conditions must be met for you to exercise these rights, or we can apply specific exemptions to you being able to exercise these rights.

Right of Access (absolute): You have the right to obtain confirmation from FI as to whether personal data concerning you are being processed and, where that is the case, access to that data.

Right to Rectification (absolute): You have the right to oblige us to rectify inaccurate personal data concerning you. Considering the purposes of the processing, you have the right to have incomplete personal data completed by providing a supplementary statement.

Right to Erasure (Right to be Forgotten) (qualified): You have the right (under certain circumstances, but not all) to oblige us to erase personal data concerning you.

Right to Restriction of Processing (qualified): You have the right (under certain circumstances, but not all) to oblige us to restrict the processing of your personal data. For example, you may request this if you are contesting the accuracy of personal data held about you.

Right to Data Portability (qualified): You have the right (under certain circumstances, but not all) to oblige us to provide you with the personal data about you in a structured, commonly used, and machine-readable format.

You also have a right to oblige us to transmit those data to another controller.

Right to Withdraw Consent (absolute): If the lawful basis for processing is consent, you have the right to withdraw that consent.

Right to Object to Direct Marketing (absolute): Where your personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for marketing, which includes profiling to the extent that it is related to such direct marketing.

Rights in Relation to Automated Decision-Making and Profiling (qualified): FI does not perform any automated decision-making based on personal data that produces legal effects or similarly affects you.

If you wish to exercise any of your rights concerning your personal data, you should contact FI's Data Protection Officer at the address shown above. If you are not satisfied with the response you receive, you have the right to lodge a complaint with the supervisory authority. In the United Kingdom this is Information Commissioner's Office:

Information Commissioner's Office
Telephone: 0303 123 1113
Email: casework@ico.org.uk
Web: https://ico.org.uk/for-the-public/
Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details the "Contact Details" section above.

**** END OF DOCUMENTATION ****