

WEBSITE PRIVACY NOTICE

Welcome to Newton's privacy notice which applies to users of our website. It may be updated at any time.

We have separate Privacy Notices for the following groups of people:

- employees and contractors;
- candidates applying for roles at Newton;
- those agreeing to take part in our marketing activities/events; and
- those whose data we may process on behalf of one or more of our clients.

Newton Consulting Limited is the "data controller" and responsible for your personal data (referred to as "Newton", "we", "us" or "our" in this privacy notice). This means that we decide how we hold and use personal data about you.

Newton respects your privacy. We think that it is important to be transparent about how we collect and use your personal data and are committed to protecting the privacy and security of the information we hold about you. This privacy notice provides more information about how we do this and provides you with certain information that must be provided under the retained EU law version of the General Data Protection Regulation (**UK GDPR**).

1 PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Newton collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to receive more information from us or register to attend an event.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

2 CONTACT

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below:

Full name of legal entity: Newton Consulting Limited

Email address: sarah.dasilva@newtonimpact.com

Postal address: 2 Kingston Business Park, Kingston Bagpuize, Abingdon, Oxfordshire, OX13 5FE

Telephone: 01865 601300

3 THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

4 DATA PROTECTION PRINCIPLES

We will comply with data protection law and principles, which means that your data will be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- relevant to the purposes we have told you about and limited only to those purposes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes we have told you about; and
- kept securely.

5 THE DATA WE COLLECT ABOUT YOU

Personal data, or personal data, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes address, email address and telephone numbers.
- **Financial Data** including bank account details.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We also collect, use, store and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered

personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

6 HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- Direct interactions - you may give us your Identity and Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter into any of our competitions or prize draws;
 - register to attend one of our events; or
 - give us some feedback.
- Automated technologies or interactions - as you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy (<https://newtonimpact.com/cookie-policy/>) for further details.
- Third parties or publicly available sources - we may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties: analytics providers such as Google based outside the EU, advertising networks and search information providers;
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

7 HOW WE USE YOUR PERSONAL DATA

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

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party).

In this context, “legitimate interest” means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data. If we expressly tell you that we are relying on consent as a legal basis for processing your personal data, you can withdraw consent at any time by contacting us at info@newtoneurope.com.

8 PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact sarah.dasilva@newtonimpact.com if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below:

| Purpose/Activity | Type of data | Lawful basis for processing including basis of legitimate interest |
|---|--|---|
| To manage our relationship with you which may include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey | (a) Identity (b) Contact (c) Profile (d) Marketing and Communications | (a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our services) |
| To administer and protect our business and this website (including troubleshooting, | (a) Identity (b) Contact | (a) Necessary for our legitimate interests (for running our business, provision of administration and IT |

| | | |
|--|--|--|
| data analysis, testing, system maintenance, support, reporting and hosting of data) | (c) Technical | services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you | (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical | Necessary for our legitimate interests (to study how clients and recruitment candidates use our website and services, to develop them, to grow our business and to inform our marketing strategy) |
| To administer any competitions or prize draws that we may run from time to time | (a) Identity (b) Contact (c) Profile (d) Usage | Necessary for our legitimate interests (to run competitions and prize draws which are of interest to our clients and recruitment candidates, and to promote Newton) |
| To use data analytics to improve our website, services, marketing, client relationships and experiences | (a) Technical (b) Usage | Necessary for our legitimate interests (to define types of clients for our products and services, to define types of recruitment candidates, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) |

9 THIRD-PARTY MARKETING

We won't share your personal data with any third party for their marketing purposes.

10 OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at info@newtonimpact.com.

11 COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. Please see our cookie policy (<https://newtonimpact.com/cookie-policy/>) for further details.

12 CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at info@newtonimpact.com.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

13 WHO HAS ACCESS TO YOUR PERSONAL DATA?

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

External Third Parties such as:

- Service providers acting as processors based inside and outside the UK who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

14 INTERNATIONAL TRANSFERS

Many of our external third parties are based outside the United Kingdom (**UK**) so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by virtue of an adequacy regulation under section 17A or adequacy decision under section 18(2) each of the DPA 2018. .
- Where we use certain service providers, we may use standard clauses approved by the Secretary of State under section 119A of the DPA 2018 which give personal data the same protection it has in Europe.

Please contact us at info@newtonimpact.com if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

15 HOW DO WE PROTECT YOUR PERSONAL DATA?

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

We have also put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

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

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

16 FOR HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. After this period, we will securely destroy your personal data in accordance with applicable laws.

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 you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

17 WHAT ARE YOUR RIGHTS?

Under certain circumstances, you have rights under data protection laws in relation to your personal data, including:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have exercised your right to object to processing (see below);
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes;
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it; and
- **Request the transfer** of your personal data to another party.

If you wish to exercise any of the rights set out above, please contact us at info@newtonimpact.com.

If you believe that we have not complied with your data protection rights, you can complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

18 NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

19 WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

20 TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

21 CHANGES TO THE PRIVACY NOTICE OR TO YOUR PERSONAL DATA

We keep our privacy policy under regular review and may update this privacy notice at any time. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.