

RAVEN CONSULTANCY
Privacy Notice

01 May 2018

Raven Consultancy of Apartment 9, General Don Apartments, 15-16 The Parade, St. Helier, Jersey JE2 3DW, Channel Islands ("**Raven**") is bound by the provisions of the Data Protection (Jersey) Law 2018, and the Data Protection Authority (Jersey) Law 2018 (collectively "**the Data Protection Laws**"), and fully committed to ensuring the protection and privacy, together with the fair and transparent processing of, any Personal Data relating to you that we come into stewardship of ("**your Personal Data**").

This Privacy Notice sets out the basis upon which any Personal Data Raven collects from or about you, or which you provide to Raven, will be processed by Raven. We would recommend that you read this document in its entirety, and advise us if you have any questions or queries. We shall respond to you by return.

What is your Personal Data ?

Simply put, your Personal Data is any data which can be used to identify you personally. This can include your name, any identification number/s you may have, location data, or any other data which enables such an identification to take place. Raven may collect and process your Personal Data from a variety of sources, including :-

- Your visits to our website : information about your computer, including your IP address, may be logged by our web host Messrs. 1&1 IONOS, and/or Google Analytics;
- Your interactions with Raven's employees on behalf of your business;
- Information you provide to us when communicating, *inter alia*, an instruction or enquiry;
- Your colleagues, who may write to us on your behalf, or instruct us to correspond with you;
- Your interactions with us on social media.

What do we do with your Personal Data ?

Raven may use and/or process your Personal Data for any reasonable purpose including, but not limited to :-

- Entering into a client relationship and provide services relating to that relationship;
- Providing you with information, products and services which Raven feels may interest you, where you have consented to be contacted for such purposes;
- Completing anti-money laundering ("**AML**") checks;
- Completing internal conflict of interest checks;
- Complying with our legal, tax and regulatory obligations;
- To ensure the security of Raven's systems, staff and premises (including the use of CCTV equipment).

Where we process Personal Data for our legitimate business interests, you have the right to object to such processing (see "**Your Rights**" below). However, please note that if you do object, this may affect our ability to carry out tasks on your behalf.

Categories of Personal Data

Here are some examples of Personal Data we may collect and process, when providing services :-

- Names – First, Middle, and Family Names/Surnames;
- Job Titles;
- Locations of Business' Divisions and Branch Offices;
- IP Addresses;
- Delivery and Invoicing Addresses (Work and Personal);
- Telephone Numbers (Work);
- E-mail Addresses (Work);
- Financial Information, such as Payment Related Information;
- Notes of Telephone Calls, and Meetings.

Cookies

Cookies are small text files that are stored on your computer when you visit websites, to collect standard Internet log information, and store visitor behaviour data. We do not use cookies on our website to track or share any Personal Data with third parties. You can disable cookies, and delete cookies already stored on your computer, but you find doing so affects some of our web-site functionality when browsing.

Your Rights

Whilst we may process aspects of your Personal Data for legitimate purposes, you have the right to retain control over that data, as it is your Personal Data. Your Rights come as a bundle and include, but are not limited to :-

- The **Right of Access**, and the **Right of Rectification**
You may request a copy of any specific Personal Data we hold about you, and may ask for any inaccurate Personal Data to be rectified, or updated.
- The **Right of Erasure**, and the **Right to Restrict Processing**
In limited circumstances you may ask us to erase your Personal Data, or restrict its processing. If (to give an example) you do not wish to be contacted via telephone, e-mail, SMS or any other means, nor for your data to be used in the ways described in this notice, please advise us at the following e-mail address: admin@raven-consultancy.com, stating your concerns, and we will take immediate action.
- The **Right to Object**
Where we process your Personal Data for legitimate purposes, you have the right to object to such processing. Please note that if you object to processing or withdraw your consent for us to process your Personal Data, this *may* affect our ability to deliver services to you.

No charge is typically raised in respect of these rights, and Raven is obliged to respond to you without undue delay upon receipt of your request. We may ask for additional information to help clarify the parameters of your request, before responding in full. Should we not satisfy your request, you have the right to raise a complaint to the relevant Data Protection Authority. Details of the Jersey authority can be found at <https://oicjersey.org/>.

Sharing of Your Personal Data

Raven may disclose your Personal Data to third parties in the certain situations :-

- If we sell, merge, consolidate, transfer or change business control, we may disclose your Personal Data to the prospective seller or buyer of such business;
- If we are required to disclose your Personal Data under any applicable law or pursuant to an order of a competent court, government department or regulatory authority;
- If we consider that such disclosure is necessary or appropriate in the course of any report under AML, counter-terrorist financing legislation, anti-bribery/anti-corruption legislation;
- If we consider that such disclosure is necessary in order to defend ourselves against any claim threatened or brought against us by any person;
- If we are working with third parties on your behalf and, in our opinion, it is necessary or appropriate to disclose information to further the services being provided to you, unless you expressly instruct otherwise;
- In cases where you provide us with your consent to do so.

How We Secure Your Personal Data

Raven is committed to protecting any Personal Data divulged to us. We have implemented appropriate security measures, technologies and procedures in order to protect your Personal Data from loss, misuse, alteration or destruction.

Although we always do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data if it is transmitted to us via unsecure means, such as traditional e-mail, and so any such transmission is at your own risk.

Once we have received your Personal Data, we will use internal procedures and security features to prevent unauthorised access.

Raven will not hold Personal Data for a period longer than is reasonably necessary to fulfil the purposes for which it was entrusted to us.

Changes to this Privacy Notice

We keep this Privacy Notice under review and any updates will appear on our website at www.raven-consultancy.com/privacy_notice.pdf

Data Controller / Representative

If you have any questions in relation to this notice or data protection within, please contact us directly, via e-mail, at admin@raven-consultancy.com.