

Privacy Policy

Effective date: 01 April 2018 - revision: 3

Introduction

Forester Business Consulting Ltd ("FBC Ltd.") is committed to ensuring that your privacy is protected and managing it in accordance with our legal responsibilities under privacy and data protection laws where we operate (e.g. the Data Protection Act 1998, or the General Data Protection Regulation (GDPR) (EU) 2016/679 which replaces it, or such other applicable legislation which may be in effect from time to time.

We may occasionally change this policy by updating this page. By using this site, you confirm that you agree to this Policy. If you are not happy with this, please do not use this site. You should also check this page periodically to ensure that you are happy with any changes.

Interpretation

In this Policy, "we" means Forester Business Consulting Ltd (and "us" and "our" will be construed accordingly); "you" means our customer, potential customer or user of this site (and "your" will be construed accordingly).

This Privacy Policy provides information about how we process personal information through this website, <u>www.fbc-ltd.com</u> ("Site").

By visiting our Site or using any of our services, you agree to your personal information being used and disclosed in the manner set out in this Policy. We will not collect personal information from you unless you have specifically agreed to us doing so (for example through your acceptance of this Policy or via an electronic tick-box or other similar measures as required by UK privacy and data protection laws).

You do not have to provide your personal information to us, but if you do not, there may be limits on the services we are able to provide to you.

This Site is owned by Forester Business Consulting Limited.

Purpose of processing activities

We have reviewed the purposes of our processing activities and selected the most appropriate lawful basis for our activities. This purpose is "contract", under Article 6(1)(b) of the EU Privacy and Communications Directive.

Therefore, the processing of relevant data is necessary for a contract we have with the individual, e.g. to deliver our side of the contract with this particular person, or because they have asked us to take specific steps before entering into a contract.

The personal information that we collect

The primary purpose of this Site is to provide you with information regarding our services provided through our consultants and associates.

We may collect the following information:

- name and job title
- contact information including email address
- demographic information such as postcode, preferences and interests
- other information relevant to customer surveys and/or offers

We explain below how we collect and store personal information about you as you use the Site.



Satisfaction Surveys

From time to time we ask our clients to participate in satisfaction surveys. If you take part in a user satisfaction survey, we may ask you to provide us with personal information, including your name and job title, email address and views and opinions.

How we use personal information

FBC Ltd. does not collect personal information from you simply by you visiting our website. The only way that we receive data from you is if you contact us directly using one of the various email links on the website or partner websites.

In that case we may use the personal information we receive from you for a number of purposes:

- Internal record keeping
- improving the services we offer
- internal record keeping
- occasionally sending promotional emails about new case studies or other information which we think you may find interesting using the email address which you have provided.
- from time to time, using the information, which you have provided to customise the website according to your interests.

We will only use your information in accordance with this Policy, or where we are required or authorised by law to disclose your information to others or have your permission to do so.

Communications from us

Where you have indicated you would like to receive a response from us, we may send email replies to tell you about our services we think you may be interested in.

Providing information to others

We work closely with trusted partners and other firms with whom we may need to share personal information to help us run this Site and provide our services. Our cooperation includes:

- other interim management companies
- our clients, for whom we provide our services.

We will share information only as anticipated within this privacy policy and wherever appropriate, try to limit disclosure to information in aggregated form, to avoid or limit identifying you personally.

We may also provide information to third party service providers who process information on our behalf to help run some of our internal business operations including email distribution, IT services and customer services.

Your information may be shared with organisations located in other countries around the world. We note that privacy laws in other countries may not be equivalent to those in your home country. Where reasonably possible, we will endeavour to ensure that reasonable levels of protection are in place to protect any data we transfer out of the UK.

We may from time to time be required to disclose information about you to law enforcement bodies, agencies or third parties under a legal requirement or court order.

You understand that we may disclose or share personal information with third parties as outlined above to operate the Site and provide our services. If you are concerned about these arrangements you should not use the Site.

Keeping information secure

We are committed to protecting your personal information from loss, misuse, unauthorised access, modification or disclosure. Where reasonably possible, we have put in place reasonable physical, electronic and managerial procedures to safeguard and secure the information we receive. However, no internet-based site can be 100% secure and so we cannot be held responsible for unauthorised or unintended access.



Information about others

If you provide us with information about other individuals, for example – but not limited to – details of a referee or personal contact, you must ensure that they have agreed to you providing us with their details. It is advisable to keep a record of their agreement and provide them with a copy of, or link to, this Policy to avoid any concern.

Updating your information

Please do keep your details up to date and notify us of any changes to your personal information. You can do this by contacting us using the details below.

Keeping your records

We keep records for as long as required to provide the relevant service, and in accordance with legal, tax and accounting requirements. Where your information is no longer required, we will ensure it is disposed of in a secure manner.

Analytics & Cookies

We use analytics tools on this Site to help deliver our online services, identify any service issues, improve our services, provide content tailored to users' personal preferences, and monitor site traffic and usage.

These tools may be provided by third-party service providers and may include the collection and tracking of certain data and information regarding the characteristics and activities of visitors to our website. We may disclose data, including personal information, to certain such third-party services providers in order to obtain such services.

One of these providers is Google Analytics and more information about the ways in which they collect and process your personal data can be found using the following link: (<u>https://www.google.com/policies/privacy/partners</u>).

A "**cookie**" is placed in the browser files on your computer's hard drive. The file is added and the cookie helps analyse web traffic or allow web applications to respond to you as an individual. Cookies also collect information about the way in which you navigate and use this Site and the internet.

This cookie does not collect information that personally identifies you as an individual (other than your Internet protocol address), but merely allows us to recognize your repeated visits to this website. We use our cookie collected information to make your visit more enjoyable. If you want to disable cookies, there is a simple procedure in most Internet browsers that allows you to turn off or delete cookies, but please remember that cookies may be required to allow you to use certain features of the Site. If you choose to block or delete cookies, this may affect the functionality of the website.

The information provided by cookies helps us to provide you with a more personal experience and allows us to make improvements to our services over time. Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us and your internet protocol address.

Links to other websites

Our website contains links to other websites of interest, e.g. associated companies and partner businesses. However, once you have used these links and left our site, you should note that we do not have control over those other websites anymore. Therefore, we cannot be held 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 statement. We encourage you to exercise caution and read the privacy statements applicable to any other website that collects personally identifiable information.

Controlling your personal information

You may choose to restrict the collection or use of your personal information in the following ways:

- whenever you are contacting us via the website, please indicate that you do not want the information to be used by anybody for direct marketing purposes
- if you have previously agreed to us using your personal information, you may change your mind at any time by writing to or emailing us at <u>datacontroller@fbc-ltd.com</u>.



• 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.

You may request details of personal information which we hold about you under the Data Protection Act 1998. An administration fee of £10 will be payable. If you would like a copy of the information held on you please write to datacontroller@fbc-ltd.com.

If you believe that any information we are holding on you is incorrect or incomplete, please write to us or email us as soon as possible, at the address below. We will correct any information found to be incorrect as soon as is reasonably possible.

Also, if you feel that we are not abiding by this Privacy Policy, you should contact us immediately via email at <u>datacontroller@fbc-ltd.com</u>.

Access rights

In some jurisdictions you may have the right to request copies of your personal information which is within our custody and control together with details about how we use that information. If you think any of the personal information we hold about you is inaccurate, you may also request it is corrected. You may also have a right, in certain circumstances, to require us to stop processing your personal information.

In relation to all of these rights, please email us or write to us at our registered address. Please note that we may, where permitted under applicable law, charge a small administrative fee and / or request proof of identity. We will respond to your requests within the applicable, legally required time frames.

In certain circumstances (for example where required or permitted by law) we might not be able to provide you with access to some of your personal information, but where appropriate we will notify you of the reasons for this.

Complaints Process

If you have a complaint about how we have handled your personal information you may contact us using the details below and we will investigate your complaint.

Third party sites

This Policy only applies to this Site. If you land on our Site from other websites (or move to other websites from our Site) you should read their respective privacy policies.

Terms of Use

This Privacy Policy governs the ways in which we collect and use information about you through the Site. For the terms and conditions which apply to your use of this Site, please refer to the <u>Terms of Use</u>.

Policy Updates

We keep this Policy under regular review and update it from time to time. Please review this Policy document periodically for changes.

If you do not accept the amended Policy, please stop using this Site.

Contact

If you have any questions about this Policy or would like to exercise your rights with respect to your personal information, please contact us via <u>datacontroller@fbc-ltd.com</u> or write to our registered address.

Forester Business Consulting Ltd.