

## **PRIVACY POLICY**

Version number: 1.0

Effective date: 13/01/2022

### **1. Who are we?**

1.1 We are H.N.F. Consultancy Limited. For privacy queries, you can contact us at support@hnfconsultancy.com. Other contact details are on our website.

### **2. What's the point of this policy?**

2.1 It tells you what to expect when we collect personal information from users of our website and services. Please only use our services if you are completely happy with this policy.

2.2 Generally, the policy covers only information provided to us. If you give personal information to other people, such as payment providers or other websites, please check their privacy policies. Nor does this policy apply to personal information that service users input into our services. For this data, we just act as a "processor" and our legal obligations are set out in our contract with service users.

### **3. Might the policy change?**

3.1 Yes. We will take reasonable steps to give you notice of the new version.

### **4. What do we collect?**

4.1 Information which you upload to our service or otherwise give us such as:

- your name and contact details;
- other information you provide on registration or otherwise;
- account information such as your username and password;
- details about your transactions on our service;
- information that you provide for display on our service or include in messages sent via our service and/or in communications with us including surveys and feedback; and
- contact or other information which you give or allow us to use for newsletters or other marketing.

4.2 Automated information about your use of our service such as: the internet protocol (IP) address used to connect your device to the internet, connection information such as browser type and version, information about your device including device-type and device identifier, operating system and platform, mobile network data, a unique reference number linked to the data you enter on our system, login details, the site from which you arrived at our service, details of your activity with date / time stamps including pages you visited and your searches / transactions.

4.3 We may collect GPS information about your location if you are a driver. You will be asked to consent to this. Please see below for an explanation of the way location information is shown to other users. You can withdraw your consent at any time as explained in our service.

- 4.4 The following information about you may be provided to us by other people:
- Limited billing information sent to us by our payment for verification purposes e.g., your name, email address and billing address.
- 5. What's our reason / legal basis for collecting the information?**
- 5.1 Because it's necessary to take steps at your request to enter into a contract with you and/or to perform such a contract. This applies to information such as initial enquiries and to account, contact, transaction, location and profile information.
- 5.2 Because it's in our "legitimate interests", e.g., sending marketing communications to customers about our similar products, managing and improving our service including tracking usage patterns and preventing or detecting fraud or abuse. This applies to information such as contact details, automated usage data and surveys and feedback.
- 5.3 Because you've specifically agreed on our service (e.g., by selecting a consent box). This may apply to contact or other information that you specifically agree to us using for certain kinds of marketing. You can withdraw permission at any time as explained on our service or by emailing us at the above email address.
- 6. How long do we keep personal information?**
- 6.1 Until you ask us to delete it or our contract with you has ended. You can end the contract as explained in our terms and conditions
- 6.2 We may nonetheless hold on to some (or all) of your information for longer if reasonably needed for legal, regulatory or tax reasons, deal with disputes, prevent fraud or abuse and/or enforce our terms and conditions (typically up to six years).
- 6.3 We will keep your information which we use only for newsletters or other marketing until you tell us to stop sending you such messages.
- 6.4 We will generally keep automated browsing information for up to 26 months.
- 7. To whom do we send or make available your personal information?**
- 7.1 To other people who supply us with services, e.g., website hosting and management, app admin, payment, email distribution, e-commerce, online advertising, analytics etc.
- 7.2 To other users of our service if you:
- include your personal information in a public action on our service, e.g., in job posted on Loadboard.live; or
  - include your personal information in communications to other users; and
  - consent to display of your location to other users (for example drivers may consent to their location being sent to their company while on a job).
- 7.3 To regulators, the police and other law enforcement or official authorities to help deal with fraud and abuse and/or comply with legal requirements and/or to protect us or others.

- 7.4 To insurers and professional advisers in connection with our insurance cover or to deal with legal claims.
- 7.5 To potential buyers so far as reasonably necessary, in the case of an actual or proposed (including negotiations for a) sale or merger or business combination involving all or the relevant part of our business.
- 8. For personal information that we handle as processor**
- 8.1 Our sub-processors include: Simply Cloud (hosting), Rackspace (hosting) and Mailchimp (emails).
- 9. Do we send your information outside the UK?**
- 9.1 Your personal information which we collect is stored within the UK and is not transferred to any other countries except as follows.
- 9.2 Your personal information (e.g., name, contact details, IP address, browsing information) may be transferred outside the UK (generally to the US) by companies that provide us with hosting, e-commerce, analytics, advertising, email distribution and other services. If so, we will ensure that there is a legal basis to do so, for example under contracts with standard contractual clauses sanctioned by the Information Commissioner that are designed to provide adequate safeguards for your personal information.
- 10. What rights do you have?**
- 10.1 If the legal requirements are met: To ask us for access to your personal information, to rectify it if there are mistakes, to delete it or restrict its use in certain circumstances or to “data portability” or to withdraw any consent you’ve given (e.g. marketing).
- 10.2 You may also have the right to object to use of your personal information in certain circumstances.
- 10.3 If you have a complaint about how we are dealing with your personal information, please contact us via the email address above. If you are not happy with our response or think we are not handling your personal information in accordance with the law, you have the right to complain to the Information Commissioner’s Office (ICO).
- 10.4 For more information about your rights, visit the ICO’s website: [www.ico.org.uk](http://www.ico.org.uk).