

Privacy Policy

About this Policy

Scala Consultancy Limited t/a Scala Consultancy (referred to as “we”, “us”, “our” and “**Scala Consultancy**”) respects your privacy and is committed to protecting your personal information. This privacy policy (“**Privacy Policy**”) will inform you as to how we look after your personal information when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This Privacy Policy aims to give you information on who we are, how and why we collect, store, use, share and process your personal information through your use of this website, including any data you may provide through this website, your rights in relation to personal information and how to contact us or supervisory authorities if you have any questions, would like to exercise your rights, or if you have a complaint.

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

When we use your personal data, we must do so in accordance with the General Data Protection Regulation (“**GDPR**”) and the Data Protection Act 2018 (“**DPA**”). Under those laws, we are responsible as ‘controller’ of your personal data. We will only process your data in accordance with the GDPR and the DPA, our legal and regulatory obligations, and in accordance with your instructions (unless those instructions are overridden by our legal and regulatory obligations).

This Privacy Policy relates to personal information that we process in the course of our business. This includes information that we collect and process in order to provide consultancy services to our clients, to operate our business (including our marketing functions) and information that we collect through your use of our website, and through other interactions with the Scala Consultancy team.

Please see the section below headed “Cookies” for information related to how we use cookies to gather and process information about your use of our website and our social media pages on Twitter, LinkedIn and other social media platforms.

In this Privacy Policy the terms “**personal data**” and “**Special Category Personal Data**” shall have the meanings given to them in the GDPR and the DPA. Under the GDPR, Special Category Personal Data means information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, genetic and biometric data and data concerning health, sex life or sexual orientation.

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

Who we are

Scala Consultancy is a business and commercial affairs consultancy which collects, uses and is responsible for certain personal information about you. This means that we are a “controller” of that personal information.

What data do we collect from (and about) you?

Personal information (also referred to as “**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 obtained from you directly or through the use of our website or when you contact us directly, or through any agent/representative of yours, any advisers or consultants which represent you, the company for which you work, other companies, organisations and people with whom you have dealings, social media channels, meeting us, government agencies, information or service providers, publicly available records and through other interactions that you have with us, including, without limitation, the following illustrative and non-exhaustive examples:

- **Identity Data** - includes your name, date of birth, marital status, nationality, gender, job title, work life, preferred language, CV, and possibly personal data about your family life.
- **Contact Data** - includes billing address, postal address, email address, telephone numbers and Skype ID and social media handles.
- **Financial Data** - includes bank/building society account and payment card details, tax details (including HMRC numbers and references (where applicable)), and the source of your funds.
- **Transaction Data** - includes details about payments to and from you and other details of services you have purchased from us.
- **Technical Data** - includes information that we collect automatically from your visit to our website such as your browsing history, internet protocol (IP) address, device ID, device type, browser type and other technical data.
- **Usage Data** - includes information about how you use our website and services.
- **Marketing and Communications Data** - includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could 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 Policy.

We do not collect any **Special Category Personal Data** about you. Nor do we collect any information about criminal convictions and offences. To the extent we need to collect any Special Category Personal Data, we will only process it with your explicit consent, or because the processing is necessary for the establishment, exercise or defence of legal claims, or the processing is necessary to protect your health in an emergency.

What about personal data relating to others which you provide to us?

If you provide information to us about someone else (such as one of your associates, directors or employees, or someone with whom you have business dealings) you must ensure that you are entitled to disclose that information to us and that the person understands that we, without taking any further steps, may process that information in accordance with this Privacy Policy.

What happens if you fail to provide personal data?

The provision of Identity Data and Contact Data is required from you to enable us to respond to your queries, provide you with services or to send you our e-newsletters (where you have signed up to receive these). If you do not provide us with the necessary information, we will not be able to administer and respond to your queries or provide you with services.

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 Data, Contact Data 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: (i) engage us to provide services (ii) request marketing to be sent to you; or (iii) contact us via our website or otherwise.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see the section below headed "Cookies".
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties, such as: (i) Technical Data and Usage Data from analytics providers such as Google based outside the EU; (ii) Contact, Identity, Financial and Transaction Data from providers of technical, payment and delivery services as well as any agent/representative of yours; and (iii) Identity and Contact Data from publicly available sources such as Companies House, social media and other online sources.

How will we use your personal data?

We will use your personal data when the law allows us to, such as in the following circumstances:

- To fulfil a contract with you when you engage us to provide services or to take steps at your request before entering into a contract.
- As required to conduct our business and pursue our legitimate interests (or those of a third party). Our legitimate business interests include our interests in providing our consultancy services, complying with legal and regulatory obligations, promoting our business including through marketing communications, ensuring network and information security, and carrying out other administrative and operational functions. We may process your personal data where such processing is necessary in order to pursue our legitimate interests, provided that our right to do so is not overridden by your own rights and interests.
- Where we need to comply with a legal or regulatory obligation.
- Where you give us your consent (eg to receive marketing communications from us). You have the right to withdraw consent to marketing at any time by contacting us at privacy@scalaconsultancy.com.

Purposes for which we will use your personal data

We have set out below 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. 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 us at privacy@scalaconsultancy.com if you need any further details.

- To register you as a client, to manage our relationship with you and respond to any queries, comments or complaints you may have when you contact us through our website or directly or at the email address referred to in this Privacy Policy, we use your Identity Data and Contact Data. This is necessary for our legitimate interests (to respond to your queries or comments using the personal data you have voluntarily provided to us).
- To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data), we use your Usage Data and Technical Data. This is necessary for our legitimate interests (for network security).
- To deliver relevant website content to you and measure or understand the effectiveness of the content we serve to you, we use your Usage Data and Technical Data. This is necessary for our legitimate interests (to study how individuals use our website and content, to develop them, to grow our business and to inform our marketing strategy).
- To use data analytics to improve our website, content, marketing, user experience, we use your Technical Data and Usage Data. This is necessary for our legitimate interests (to keep our website updated and relevant, to develop our business and to inform our marketing strategy).

Marketing

We may use your Identity Data and Contact Data to send you newsletters and marketing emails where you have expressed you would like us to do so. You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you (including by clicking on the “unsubscribe” button at the bottom of any email newsletter) or by contacting us at privacy@scalaconsultancy.com at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of other dealings via our website or when you have engaged us to provide services.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Cookies

We and our trusted partners use cookies and other technologies in our related services, including when you visit our website or access our services.

Cookies are text files containing small amounts of information which are downloaded to your device when you visit our website at www.scalaconsultancy.com (“**website**”). Cookies are very helpful and can be used for various different purposes. These purposes include allowing you to navigate between pages efficiently, enabling automatic activation of certain features, remembering your preferences, and generally improving the user experience.

Cookies can be “First Party”, i.e. set by us, or “Third Party” – set by another company to perform the function.

Our website uses the following types of cookies:

- “**session cookies**”: which are stored only temporarily during a browsing session in order to allow normal use of the system and are deleted from your device when the browser is closed;
- “**persistent cookies**”: which are read only by the website, saved on your computer for a fixed period and are not deleted when the browser is closed. Such cookies are used where we need

to know who you are for repeat visits, for example to allow us to store your preferences for the next sign-in;

- **“third-party cookies”**: which are set by other online services who run content on the page you are viewing, for example by third-party analytics companies who monitor and analyse our web access.

Cookies do not contain any information that personally identifies you, but personal data that we store about you may be linked, by us, to the information stored in and obtained from cookies.

When you first visit our website, we will continue to set all cookies on your device if you continue to use the website. You have the ability to accept or disable cookies by modifying the settings in your browser. The methods for doing so vary from browser to browser, and from version to version. You can obtain up-to-date information about blocking and deleting cookies via the support pages made available by your browser operator. You can find out how to do this for your particular browser by clicking “help” on your browser’s menu or by visiting <http://www.allaboutcookies.org/manage-cookies/index.html>.

However, please be aware that should you choose to disable, block or delete cookies, you may not be able to access all or parts of our website, or some features of our website may not operate properly and your online experience may be limited.

For more information about cookies generally, please visit [All About Cookies](#).

Our website allows a third party, Google Analytics (the web analysis service provided by Google to generate statistical information about the use of websites) to use their persistent and session cookies on our website. We use Google Analytics to analyse the use of the website. Google Analytics gathers information about website use by means of cookies. For further information about the cookies used by Google Analytics, please read [Types of Cookies used by Google](#). Google utilises the data collected to track and examine the use of our website, to prepare reports on its activities which we review and use the information in them to improve our website. Google also shares those reports with other Google services. Google may also use the data collected to contextualise and personalise the ads on its own advertising network. The personal data that is collected is cookie and usage data, and that processing takes place in the USA under Google’s standard terms and privacy policy, which you will find [here](#). For further information regarding how Google processes the data it collects please read [Google’s overview of privacy and safeguarding data](#). You can opt out of Google Analytics cookies on the cookie pop-up you see before viewing our website. You have the option of refusing to accept Google Analytics cookies when you first visit our website.

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 privacy@scalaconsultancy.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.

Who we share your personal data with

We may have to share your personal data with the parties set out below for the purposes set out above in the section headed “Purposes for which we will use your personal data”:

- Technical service providers acting as processors, who provide IT hosting and system administration, email marketing, web analytics and CRM database.
- If we're involved in a reorganization, merger, acquisition or sale of some or all of our business and/or or assets, your personal data may be transferred as part of that deal. 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 Policy.
- Professional advisers who we instruct on your behalf or refer you to such as auditors, lawyers, barristers, bankers, accountants, financial advisers, tax advisers, insurers and other experts, who provide consultancy, legal, insurance, accounting, financial, tax related and other professional services.
- The other side and/or the parties on any given matter.
- Other third parties where necessary to carry out your instructions.
- Our insurers and brokers.
- Our bank.
- In order to protect our rights, property or safety eg fraud protection, credit risk reduction etc

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.

We may also be required to disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

Where your personal data is held

Information may be held at our offices and those of our service providers and other third parties as described above in the section headed “Who we share your personal data with”.

Some of these third parties may be based outside the European Economic Area (EEA). For more information, including on how we safeguard your personal data when this occurs, see section below headed “Transfers of your personal data outside the EEA”.

Transfers of your personal data outside the EEA

We may transfer your personal data outside the UK and the EEA. Whenever we transfer your personal data outside the UK and the EEA, we will ensure a similar degree of protection is afforded to it by ensuring appropriate safeguards are implemented. Please contact us if you want further information about the specific mechanism used by us when transferring your personal data outside the UK and the EEA.

Keeping your personal data secure

We have appropriate security measures in place to prevent personal data from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.

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

How will you store my personal data and how long for?

We ensure that appropriate and suitable safeguards and technical measures are in place to protect your personal data, and that transfers of your information are limited to the necessary minimum. We will only keep records of your personal data for as long as is reasonably necessary for the purposes for which we have collected it, and in order to comply with any statutory or regulatory obligations in relation to retention of records, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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.

Your Rights

You have a number of rights under applicable data protection laws which may apply in certain circumstances. The Information Commissioner's Office's website provides a helpful and informative summary of your rights which you can access here: <https://ico.org.uk/your-data-matters/>. In particular, we would like to remind you that you have the right to:

- Access: the right to be provided with a copy of your personal data.
- Rectification: the right to require us to correct any mistakes in your personal data which we hold.
- To be forgotten: the right to require the erasure of personal data concerning you in certain situations.
- Restriction of processing: the right to require us to restrict processing of your personal data - in certain circumstances, e.g. if you contest the accuracy of the data.
- Data portability: the right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party - in certain situations.
- To object: The right to object
 - At any time to your personal data being processed for direct marketing (including profiling);
 - In certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests.
- Not to be subject to automated individual decision-making: the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

If you would like to exercise any of the above rights or if you have any questions regarding this Privacy Policy, please email us at privacy@scalaconsultancy.com and let us have enough information to identify you. We may need to request specific information from you to help us confirm your identity. 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.

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.

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.

Please note, however, there are exceptions to the rights of individuals in relation to their personal data and, particularly if we are processing your personal data for the purpose of providing advice to our clients, your rights may be limited. We will, at all times, respect your personal data and seek to be as transparent as possible but please be aware that in some instances we may be restricted by law from even acknowledging that we process your personal data.

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 policy of every website you visit.

How to complain

If you have a question about the information provided in this Privacy Policy, or you have a concern or complaint about the way in which we process your personal data, please contact privacy@scalaconsultancy.com. We hope that we can resolve any query or concern you raise about our use of your personal data.

You also have the right to lodge a complaint regarding our processing of your personal data with your data protection supervisory authority in a country where you live, work or where any alleged infringement of data protection laws may have occurred. The supervisory authority in the UK for data protection issues is the Information Commissioner's Office (www.ico.org.uk) who may be contacted at <https://ico.org.uk/concerns/>. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the Privacy Policy and your duty to inform us of changes

We keep our Privacy Policy under regular review and will update it from time to time and any amended policy will be posted on our website at www.scalaconsultancy.com. Material changes will be effective immediately upon the display of the revised Privacy Policy. Your continued use of the website, following the notification of such amendments on our website, constitutes your acknowledgment and consent of such amendments to the Privacy Policy and your agreement to be bound by the terms of such amendments. We recommend that you regularly review the policy

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.

Scala Consultancy Limited t/a Scala Consultancy
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