

# Data Privacy Policy

V1.2 - Oct 2023

**CLASSIFICATON: PUBLIC** 

Perigon Partners LTD is registered in Scotland, company number 716835, registered office address 30/5 Hardengreen Industrial Estate, Eskbank, Scotland, EH22 3NX.

# Data Privacy Policy

#### **Overview**

At Perigon Partners, we understand that your privacy is important to you and we are committed to respecting your privacy and personal data, using personal data responsibly and complying with all applicable laws and data privacy regulations.

#### **Purpose**

This policy aims to give you a clear explanation of how we collect, handle and protect any personal information in connection with Perigon Partners' business activities.

#### Who we are

Perigon Partners Ltd is a strategy consultancy company, registered in Scotland under company number 716835. Our registered office address is 30/5 Hardengreen Industrial Estate, Eskbank, Scotland, EH22 3NX.

### Categories of personal data that we process

In respect of clients: Name; Role; Address; Telephone number; Email address.

In respect of colleagues: As above plus Date of birth; National insurance number; Pension information; Bank details; Employment history and eligibility; Performance reviews; Dates and essential details regarding health-related or parental leave.

In respect of stakeholders of clients (during a double materiality exercise or other engagement): Name; Role; Email address.

### Sources of personal data

Primarily, the personal data is provided by you. In some instances for prospective clients, personal data will be provided from third party sources (including those that are publicly available). In these cases, we endeavour to notify you to let you know the source, how we intend to process the data and how you can limit or prevent its use.

### Why and how we process personal data

Any personal data that we collect and process is in the course of Perigon Partners' business activities such as building and maintaining relationships, providing our services, and recruiting, employing and managing staff.

The legal bases for processing this data are:

- Contract
- Legitimate interest
- Legal obligation

We do not share any personal data with third parties unless to comply with legal obligations, such as the sharing of employee personal data with HMRC.

We have generally accepted standards in place to protect your personal data from loss, misuse, alteration or destruction. Only authorised Perigon Partners staff (and third parties where relevant) are given access to your personal data and are required to treat the information as confidential. Although these standards are in place and precautions are taken, we cannot guarantee that unauthorised access to your personal data will not occur.

All information is stored and processed in the UK.

We delete personal data six years after we complete our services to you and your company, or the company that you are a stakeholder of, or after the end of your employment with Perigon Partners.

Our website, http://www.perigonpartners.co.uk, is hosted by Wix which collects standard, anonymous, website traffic data which we use to understand visitor numbers to different parts of our website so that we can tailor and improve its content and/or structure. We also, from time to time, engage other third-party service providers such as Google Analytics to collect further standard internet log information. At no time do we make (or give permission to third-parties to make) any attempts to find out the identities of visitors to our website.

### Your legal rights

Perigon Partners uses and protects the data of EU citizens under the EU's General Data Protection Regulation, more commonly known as GDPR. This gives you certain legal rights over your personal data including the right to request access for the purposes of reviewing, modifying, correcting, requesting a copy or deletion of the data, or requesting that we cease processing your personal data.

There are also rights in relation to automated decision making and profiling as well as the right to raise a complaint with the Information Commissioner's Office if you feel that your personal data has not been dealt with correctly.

## **Getting in touch**

If you would like to make a request to access, review, or correct the personal data we have collected about you, or to discuss how we process your personal data, please contact us at hello@perigonpartners.co.uk.

# **Policy changes**

We regularly review our data privacy policy and processes and will incorporate any updates on our website. This policy was updated on 21 October 2023.

#### **Revision History**

Date of Change	Responsible	Summary of Change
Jan 2022	E Walford	Policy creation
June 2023	L McNeil	Updated registered address and added revision history tracking
Oct 2023	E Walford	Updated to incorporate client stakeholders' data for double materiality exercises or other engagements