

## **WELCOME TO ACCORDIENCE'S PRIVACY NOTICE.**

Accordience is a communications group that uniquely combines best-in-class, specialist consultancy with the scale to operate at pace both globally & locally. We help brands and businesses reach and influence audiences that matter. We believe in the power of communication and agile collaboration to create opportunity and positive change for our clients and our people.

### **Data Controller**

Accordience is the brand used to represent a number of affiliated communications agencies including but not limited to Grayling, Citigate Dewe Rogerson, Red Consultancy and Cirkle which share the same operating parent company, Inizio Group Limited (together "Accordience" or the "Accordience Group").

This privacy policy is issued on behalf of the Accordience Group, so when we mention "Accordience" "we," "us," or "our" in this privacy policy, we are referring to the relevant company in the Accordience Group responsible for processing your data.

### **Data Processor**

Accordience also conducts data processing activities on behalf of its clients who will normally be the data controller for such activities. Where Accordience is a data processor, we may only process personal data in accordance with the controller's documented instructions as set out in a data processing agreement or contractual arrangement.

We respect your privacy and are committed to protecting your personal data. By 'your personal data' we mean any information about you, that you or third parties provide to us. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

We keep our privacy notice under regular review. This privacy notice is effective from June 2024.

### **Privacy Notice Sections**

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## **1. IMPORTANT INFORMATION AND WHO WE ARE**

### **Purpose of this privacy notice**

This privacy notice informs you how we collect and process all personal information relating to individuals received by Accordience, including but not limited to, personal information of employees, job applicants, suppliers, contractors, freelancers, consultants, clients, business contacts or personal data you may provide through this website. For example, in signing up to receive our newsletters,

updates, marketing communications, or when you download whitepapers or take part in a survey or competition.

This website and privacy notice is not intended for children.

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

We have appointed a data protection officer (“DPO”) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

## 2. CONTACT DETAILS

Our full details are:

Trading name:	<b>Accordience</b>
Legal entity:	Inizio Group Limited
Name or title of DPO:	Group Data Protection Officer
Email address:	privacy@Accordience.com
Postal address:	8 <sup>th</sup> Floor, Holborn Gate, 26 Southampton Buildings, London, WC2A 1AN
Phone number:	+44 (0) 20 3861 3999

You have the right to make a complaint at any time to the supervisory authority for data protection issues in the country in which you reside. We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority, so please contact us in the first instance.

### Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal data changes during your relationship with us.

### 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 personal 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 notice of every website you visit.

## 3. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, 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, which we have grouped together as follows:

- **Identity Data** includes first name, last name or similar identifiers, marital status, date of birth, gender and details relating to recruitment and employment;

- **Contact Data** includes addresses, email address and telephone numbers;
- **Financial Data** includes bank details, salary and benefits information;
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website;
- **Profile Data** includes your current job role, interests, preferences, job application data; feedback and survey responses;
- **Usage Data** includes information about how you use our website and services; and
- **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 may 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 notice.

We may collect, use and/or share Special Categories of Personal Data (or Sensitive Personal Data) about you (which may include information about your health, genetic and biometric data, details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions and/or trade union memberships). Your explicit consent will be obtained by us where any Special Categories of Personal Data are collected, used or shared.

#### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

#### **4. HOW IS YOUR PERSONAL DATA COLLECTED?**

We use different methods to collect personal data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Profile and Marketing and Communications Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - Subscribe to our service or publications;
  - Request marketing to be sent to you;
  - Take part in market research;
  - Apply for a job;
  - Enter a competition, promotion or survey; or
  - Provide us with feedback.
- **Automated technologies or interactions.** As you interact with our website, we may collect Technical and or Usage Data about your equipment, browsing actions and patterns via “Cookies” or other technologies such as Logfiles, Pixel Tags/Web Beacons, Social Media features and Analytics (*collectively referred to as “Technologies”*). To manage Cookies, you can select “Cookie Settings” when you enter our website(s) and choose cookie options from

within our cookie banners. If you would like to opt-out of other Technologies we employ on our websites, you may do so by blocking, deleting or disabling them as your browser or device permits.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources. Such as Google analytics who may be based outside the EEA.

## 5. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- To manage our relationship with you;
- Process your request for news items about our company(ies) or Group and, if you agree, to email you about other services we think may be of interest to you;
- If you make an employment enquiry we will pass your details to other relevant companies within the Group;
- If you make an enquiry about our services, we will pass your details to the relevant company(ies) within the Group to ensure that your enquiry is adequately dealt with;
- Process your personal data for research purposes as outlined in the consent process through which you supplied this to us;
- Enable certificates to be issued and analyses of e-learning performed;
- Email you about similar goods and services to those you've purchased from us which you may be interested in; and
- Enter and perform a contract with you or to perform any steps you require from us before entering into the contract. If you do not provide information required by us to enter into a contract with you, we will not be able to enter into that agreement with you or provide you with the services you require.

We will rely on one or more of the following legal grounds (as appropriate) to process your personal data:

- To enter and perform a contract with you or to perform any steps you require from us before entering into a contract;
- To pursue our legitimate business interests in providing and marketing our products and services;
- Your specific consent to us using your information, which you can withdraw at any time;
- To comply with our legal obligations and establish, exercise or defend our legal rights; and
- Those other purposes that you have agreed with us.

### Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which other services may be relevant for you (we call this marketing). Initial marketing to business contacts such as health care professionals is typically upon the basis of legitimate interest.

You may also receive marketing communications from us if you have requested information from us or if you provided us with your details when you entered a competition or registered for a service or promotion and, in each case, you provided consent to receive marketing communications.

### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any company outside the Accordience Group who would then use it for marketing purposes.

### **Opting out**

You can ask us to stop sending you marketing messages by unsubscribing at any time.

### **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.

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.

## **6. DISCLOSURES OF YOUR PERSONAL DATA**

Accordience is a global group of companies and we may share your personal information with other members of the Group. The nature of our business, operations and services requires us to transfer your information (from time to time) to our associated offices and/or group companies. We may transfer the information we collect about you to countries other than your home country or other than the country in which the information is originally collected. Your personal information may be accessible by our other international entities. We will take appropriate steps to ensure that your information is protected and handled in accordance with legal requirements and as described in this Privacy Notice.

We may also share your information with selected third parties including:

- Business partners, clients, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; and
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or to enforce any contract or agreement between us; or to protect the rights, property, or safety of Accordience, our staff, customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

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.

## **7. INTERNATIONAL TRANSFERS**

Whenever we do transfer your personal data to another jurisdiction, we will take appropriate steps to protect such, which includes the following:

- (i) Entering into an agreement with the third party which includes clauses that offer adequate protection for your information and these will offer no less protection than are provided by those determined by the EU commission, a template copy of which is available at: [https://commission.europa.eu/law/law-topic/data-protection\\_en](https://commission.europa.eu/law/law-topic/data-protection_en); or
- (ii) Otherwise ensuring that information would only be transferred to third parties in jurisdictions that have at least the same data privacy protection for personal data as the jurisdiction from which the personal data originates from. For example, in the case that the personal data originates from the EEA or UK and is transferred to a third country that has been deemed to offer adequate protection by the EU Commission or UK ICO for the processing of your personal data.

## **8. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

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

## **9. DATA RETENTION**

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, tax, reporting requirements or as is consented to by yourself.

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.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **10. YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data, which include the following:

- Request access to your information by submitting a request to the DPO at Accordience;
- Update or amend your information if it is inaccurate or incomplete;

- Object to certain uses of your personal data, including direct marketing and processing based on legitimate interests and processing for purposes of scientific or historical research and statistics on grounds relating to your particular situation;
- Request the deletion of your information, or restrict its use, in certain circumstances (for example, subject to lawful exceptions applying, you can request that we erase your information where the information is no longer necessary for the purpose for which it was collected);
- To withdraw any consents you have provided in respect of our use of your information;
- To request a copy of the information you have provided to us, to use for your own purposes (often called your right to data portability); and
- To lodge a complaint with the relevant data protection supervisory authority in your jurisdiction.

If you have subscribed to us or agreed to be on a contact list to receive information from us, you can ask to be removed at any time by using the unsubscribe link included in any e-communications, or by emailing [privacy@Accordience.com](mailto:privacy@Accordience.com).

If you have any questions about these rights, or you would like to exercise any of them, please contact us by submitting a request to [privacy@Accordience.com](mailto:privacy@Accordience.com).

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.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). 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.

### **Time limit to respond**

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.