

## **Privacy Policy for Client and Other Professional Contact Data**

This document describes the privacy policy ("Privacy Policy") of PIRC Ltd ("PIRC," "we," or "us") related to personal data held by PIRC concerning business or professional contacts ("you" or "your").

We take your privacy seriously because we know you do. We are committed to processing your personal data held by PIRC ("Contact Data") in accordance with this Privacy Policy and in compliance with all applicable legislation and regulations for the protection of personal data.

Please read this Privacy Policy carefully and be aware that we may change it from time to time. If at any point we alter this Privacy Policy in ways that allow us to handle your personal data in a significantly different manner, we will notify you by e-mail or otherwise, and you will have a choice as to whether or not we may use your Contact Data in the new manner.

### **Contact Data We May Hold**

We limit the personal data we hold to what is relevant for supplying or marketing our services or otherwise conducting business.

Individuals from whom we retain Contact Data include clients, potential clients, suppliers, service providers, government officials, journalists, academics, industry experts and others with whom we have a business or professional relationship (collectively "Contacts"). The types of contact data we may hold include:

- Name
- Telephone/address information (such as telephone numbers, street address, e-mail address)
- Other business or marketing-related personal details (such as business or professional role, business title, Company)
- PIRC products and services previously purchased/provided
- contact preferences (such as individual's preference to be contacted via e-mail but not by telephone)

### **Sources of Contact Data**

We obtain Contact Data when individuals:

- Are designated by their employer as our contacts for the purpose of submitting reports or for managing the service relationship.
- complete an online submission form via our website, or request to be placed on our mailing list
- buy goods or services from PIRC
- request information from us or;
- Otherwise provide PIRC or a PIRC employees with their contact details or other personal data.

Contact Data may also be obtained from published and public sources, including corporate websites or stock exchanges

### **How We Use Contact Data**

We use Contact Data to:

- provide clients with services or data they request,
- advise clients and potential clients about products and services offered by PIRC,

- Correspond with our Contacts.
- Provide Company contacts with copies of PIRC reports

We will only ever disclose Contact Data to others with the individual's prior permission.

#### **How We Protect Contact Data**

We place a high priority on the security of your Contact Data. We apply appropriate technical, administrative, and physical safeguards to protect against foreseeable loss, unauthorised access, destruction, misuse, modification, and improper disclosure. However, no system or data can ever be fully protected against every possible hazard. As a result, we cannot ensure or warrant the security and privacy of any data you provide to us and, accordingly, you do so at your own risk.

All employees, consultants, and agents of PIRC are required to comply with the terms of this Privacy Policy and also an internal Data Protection Policy that also covers Contact Data. Failure to do so could result in disciplinary action.

#### **Your Rights**

You may change your contact channel preferences, or request that you stop receiving all communications from us, at any time by contacting us (See Contacts and Complaints).

You may review your Contact Data at any time and instruct that it be corrected, updated, or deleted, by contacting us as provided below. We will take all reasonable steps to make the requested changes promptly. However, you should be aware that it is not technologically possible to change or delete each and every instance of the data we hold on you from our systems, and Contact Data may remain in non-erasable forms. We may retain Contact Data for a period in our backup systems. We may also retain some data for longer periods as required by law, contract, or auditing requirements.

This Privacy Policy is designed to establish a uniform minimum standard for PIRC's handling of Contact Data in line with current data protection legislation.

#### **Data Collected through PIRC's Web Site**

We also collect personal data from users of our web site. Any personal data gathered through our web site that are used in PIRC's general client contact databases along with other Contact Data are treated in accordance with the Privacy Policy for Client and Other Professional Contact Data.

#### **Contacts and Complaints**

If you have any questions or concerns about this Policy, please e-mail us [info@pirc.co.uk](mailto:info@pirc.co.uk), or speak with your PIRC contact.