

## How we use your information...

This privacy statement tells you what to expect when NewCMI Ltd collects your personal information. It applies to information we collect about:

- > Visitors to our website
- > Complaints and feedback received

And information required for:

- > Commercial purposes and providing our services to our customers
- > Marketing of NewCMI Ltd
- > Job applicants and our current and former employees

## Visitors to our website

When someone visits our website, we use third-party services from Google Analytics and HubSpot, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way that does not identify anyone. We do not make, and do not allow Google or HubSpot to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

## Use of cookies by NewCMI Ltd

You can read about how and why we use cookies on our [Cookies Page](#).

## Submission of your information

Submission of your information, requested, from our website is held on our secure platform. This is protected by all methods necessary. Only required personnel have access to this information. Your information will only be used for the stated intended purpose and will not be shared outside of NewCMI Ltd without your express consent. Your consent to share your information will be sought at the time of you submitting your data.

## Complaints and feedback

Should you wish to make a complaint, our complaints process is available upon request. All information received during the course of a complaint is handled with the same level of security, protection, or need for privacy as any other information we collect.

## Information required for commercial purposes and providing our services to our customers

NewCMI Ltd use information provided by you to provide our services and products to our customers. This data is only used for its intended and stated purpose. This includes financial information for the production of invoices and receipt of payments for services provided.

## Protecting your information

In order to protect your information, we have utilise the following methods:

- > Monitored Firewall protection
- > Malware protection on all platforms
- > Encryption on data at rest and at point of use
- > Ongoing backups
- > Auditing for data integrity on an ongoing basis

## Information Backups

NewCMI Ltd have a backup policy in place. We retain backups for a maximum of one month. Upon receiving a request to remove data of a personal nature, this will be completed by removing all reference and data from the production environment. The full deletion of this data will be achieved after the retention period stated above has been reached. Where data backups are indefinitely retained, we have a methodology in place to remove data from the backup medium.

## Requests for your information

We will respond to requests for the information we hold on you within the required 30-day period. Initial requests will not be charged. However, should more than two requests be made within a three-month period of time, subsequent requests will be charged at £10 per request.

All information will be provided in the format of a PDF document.

## Marketing Information

NewCMI Ltd collect information from various sources for marketing purposes. This information can be from social media platforms or industry forums. We also purchase information from public forums, to name but a few. We retain this information for a period of no more than 18 months, or the duration of the marketing campaign only.

## Sharing information

NewCMI Ltd share information with the following external organisations for commercial purposes:

- > Accountant
- > Pension Provider
- > Customers
- > Marketing Contractors

Information is shared with organisations within UK-EU. Some data relating to business marketing is held in the USA. The exception to these criteria is the sharing of information with UK authorities for investigatory purposes as per current legislation on finance and personnel.

## Supplier Information

NewCMI Ltd is aware that supplier information is sometimes personal in nature. This information is protected to the full extent as any other information within our environment. This information is not shared unless express permission is granted by the individual.

## **Job applicants and our current and former employees**

### **Job applicants**

When NewCMI Ltd receive job applications we hold these in a secure manner. The application forms are deleted or, in the instance of hard copies, shredded after the selection period is completed. This information is not shared outside our organisation and is only shared internally with designated personnel. Where information of an applicant is to be retained for future use, only the contact information will be retained. Consent from the applicant will be sought prior to the retention of any personal contact information.

### **Current employees**

All personal information held by NewCMI Ltd on current employees is managed and maintained in a secure manner, the same as any other information we hold. All employees have the right to view the data we hold on them at any time. A formal request is required to be made for this information through their line manager.

### **Former employees**

All personal information held by NewCMI Ltd on former employees is managed and maintained in a secure manner, the same as any other information we hold. Should a former employee wish to view the data that we hold on them, the steps for requesting information (detailed above) must be followed. Information held on personnel is retained for a period no longer than 3 years after the cessation of employment, in line with current UK legislation. After this period of time all information on the former employee is deleted. If requested, a confirmation of this will be communicated to the person.

## **Reporting of Data Breaches**

NewCMI Ltd report all major breaches of data we have control and are responsible for to the Information Commissioners Office, our customers and/or suppliers. All potential data breaches are fully investigated as per our Information Security Incident Policy.

When a data breach is detected, and the severity ascertained, this will be reported to the ICO within 72 hours.

### **Security and Protection**

NewCMI Ltd take security of all information seriously, we hold certification to the following schemes: ISO27001:2013 Information Security Standard. As such, our management system is audited and verified on an annual basis.

### **Data Protection Officer**

Any questions related to data protection can be directed to NewCMI Ltd's Data Protection Officer (DPO) at [DPO@newcmi.com](mailto:DPO@newcmi.com).