



Privacy Policy

INTRODUCTION

In this document, "we", "our", or "us" refer to LaunchPad Associates Limited. Our company number is 08291826 registered in England and Wales. Our registered office address is at Mile House, Bridge End, Chester-le-Street, County Durham, DH3 3RA. Our Privacy Statement relates to both LaunchPad Associates Limited and our trading Company LaunchPad HR.

This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.

We take seriously the protection of your privacy and confidentiality. We understand that all our clients, employees, contractors and suppliers are entitled to know that their personal data will not be used for any purpose unintended by them and will not accidentally fall into the hands of a third party.

We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.

Our policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR). The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data.

Except as set out below, we do not share, or sell, or disclose to a third party, any information we collect.

This policy explains how we collect data, how we use and store information and what it means for you.

WHAT INFORMATION DO WE COLLECT?

Directly with us

We collect personal information each time you deal with us, make an enquiry (in person, by email, through the website, over the phone or otherwise), make a payment, respond to questionnaires or updates, provide us with feedback, or otherwise provide your personal details, we collect the information you provide.

From website interaction with us

We collect non-personal data such as IP addresses, details of pages visited and files downloaded from our website. Website usage information is collected using cookies. See the section on Cookies below.

Information from third parties

Although we do not disclose your personal information to any third party (except as set out in this notice), we may sometimes receive data that is indirectly made up from your personal information from third parties whose services we use. No such information is personally identifiable to you.

Where you give your permission to other organisations

We may collect information that you make available on, for example, Twitter, Facebook, LinkedIn or similar organisations. You may wish to check their privacy policy to find out more information on how they will process your data.

From publicly available data

We may collect information from Companies House for example, and information published in articles, newspapers or blogs.

WHAT DO WE DO WITH IT?

Basis of processing your data

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category. If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data. If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

Contractual obligation: when you pay for our service or otherwise agree to our terms and conditions, a contract is formed between you and us. In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it to:

-  Provide you with our services;
-  Provide you with updates and resources;
-  Sell or recommend products to you;
-  Contact you about any changes to our service;
-  Provide you with suggestions and advice on products or services.
-  We process this information on the basis that there is a contract between us. We will continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract (see our Terms & Conditions).

Consent: By becoming a client or completing an online web form, you have given us consent to collect and process the personal information you provide. You are free to change your preferences at any time by contacting us by telephone, post or email as shown in the below section.

In situations when there is no contractual relationship between us, such as when you browse our website or ask us to provide you with more information about our business, including job opportunities and our products and services, you provide your consent to us to process information that may be personal information. Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies (see the below section on Cookies for more information).

Sometimes you might give your consent implicitly, such as when you send us an email to which you would reasonably expect us to reply.

Except when you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our website.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists. You may withdraw your consent at any time by instructing us at hello@launchpadhr.co.uk. However, if you do so, you may not be able to use our services further.

Legitimate Interest: We may process information on the basis that there is a legitimate interest, either to you or to us, of doing so. If you have become a client, we may rely on our legitimate interest in order to collect the information we need to provide this service. Where we process your information on this basis, we do so after having given careful consideration to:

- Whether the same objective could be achieved through other means;
- Whether processing (or not processing) might cause you harm;
- Whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so.

For example, we may process your data on this basis for the purposes of:

- 📁 Record-keeping for the proper and necessary administration of our business;
- 📁 Responding to unsolicited communication from you to which we believe you would expect a response;
- 📁 Protecting and asserting the legal rights of any party;
- 📁 Insuring against or obtaining professional advice that is required to manage business risk;
- 📁 Protecting your interests where we believe we have a duty to do so.

Legal obligation: We are subject to the law like everyone else. Sometimes, we must process your information in order to comply with a statutory obligation. For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order. This may include your personal information.

Processing of requests / payments / calls to action:

Personal information which you provide is collected and stored electronically on password protected files, any information on physical paper or otherwise is locked in a secure filing cabinet in our alarmed office. Our Directors and authorised employees are the only members of LaunchPad Associates Limited will access to this information.

We may use the personal data we collect to:

- 📧 Send you information regarding our service or products;
- 📧 Contact you about the service we are providing you;
- 📧 Keep you up to date on news and stories about our team and work;
- 📧 Process payments;
- 📧 Provide a personalised or customised service, such as personalised emails;
- 📧 Keep records of your relationship with us, e.g. questions you have asked or complaints or comments you have made;
- 📧 Classify clients by location;
- 📧 Analyse the personal information we collect about you and use publicly available information to aid our understanding of who uses our service;
- 📧 Conduct market research

Applying for a job with us:

Where you provide personal data and sensitive personal data when applying for a job with us, such as the information on your CV, we will process, store and disclose the personal data we collect to:

- 📧 Support the recruitment process;
- 📧 Enable you to submit your CV and apply online for jobs;
- 📧 Answer any questions you may have;
- 📧 Use third parties to provide services such as references, qualifications, criminal referencing, checking services, verification of information you have provided and skills tests;
- 📧 Provide anonymised data to monitor compliance with our equal opportunities policy.

SENDING A MESSAGE TO OUR TEAM

When you contact us, whether by telephone, through our website, in person or by email, we collect the data you have given to us in order to reply with the information you need. We record your request and our reply in order to increase the efficiency of our business.

We keep personally identifiable information associated with your message, such as your name and email address, so as to be able to track our communications with you to provide a high-quality service.

LODGING A COMPLAINT

When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

HOW AND WHERE WE STORE YOUR INFORMATION

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- 📄 To provide you with the services you have requested;
- 📄 To comply with other law, including for the period demanded by our tax authorities;
- 📄 To support a claim or defence in court
- 📄 For researching, feedback and reporting on our service

Security

- 📄 We ensure that we have in place appropriate technical controls to protect any personal data you provide. For example, we ensure that online forms and our web application, are encrypted and our network is protected and routinely monitored.
- 📄 We ensure that access to personal data is restricted only to those staff members or whose job roles require such access and that suitable training is provided for these staff members.
- 📄 We may make limited use from time to time of external companies to collect or process personal data on our behalf. When we do so, we carry out checks on these companies, put in place contracts to make sure our requirements are clear, and carry out periodic reviews. When we do use external companies, we remain responsible for the storing and processing of your personal data.
- 📄 However, we need to remind you that despite all our efforts the internet cannot be guaranteed to be 100% secure, and that you submit data at your own risk.

Where we store your personal information

We use cloud-based systems to process data and therefore data may be processed outside of the EEA.

When we share your information

We do not share or swap your information with other businesses unless otherwise outlined in this privacy policy

Legal duty

We may need to pass on information if required by law or by a regulatory body, or if asked for details by a law enforcement agency.

Our service providers and third parties

Occasionally we may employ agents to carry out tasks on our behalf, such as fulfilling client projects or processing payments. These agents are bound by contract to protect your data and we remain responsible for their actions.

We may provide third parties with general information about users of our site, but this information is both aggregate and anonymous.

Although we do not disclose your personal information to any third party (except as set out in this notice), we may sometimes receive data that is indirectly made up from your personal information from third parties whose services we use. No such information is personally identifiable to you.

COOKIES

What are Cookies?

We collect data using cookies. A cookie is a text file that is sent from our website as soon as you visit the site. It is stored on your computer's hard drive and helps us to identify your computer (not you) and collects information in an aggregate, anonymous way.

Cookies may be used to collect information about your visit to our website, for example traffic data, location data, device information, the date and time of your visit and the pages that you visit.

The use of cookies is an industry standard for most major websites.

LaunchPad Associates Limited use of Cookies on our website

To enjoy the LaunchPad Associates Limited website to the full, we recommend that you leave cookies turned on. If you turn off cookies then you may not be able to enter parts of the site. Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely. The cookie data that we collect we may use to:

-  Track how you use our website;
-  Customise the content on our website and to help to understand the visitor's current and future needs;
-  Record whether you have seen specific messages we display on our website;
-  Process any requests, applications or payment you may make;
-  Aid internal administration and analysis.

Managing Cookies

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose. Most browsers allow you to turn off the cookie function. To do this you can look at the help function on your browser.

Third party Cookies

LaunchPad Associates Limited works with a number of third-party suppliers who set cookies on our website to enable them to provide us with services. These are mainly used for reporting and advertising purposes so we can improve the way we communicate.

We may use websites such as YouTube to embed videos, and you may be sent cookies from these websites. We do not control the setting of these cookies, so we suggest you check the third-party website for more information about their cookies and how to manage them.

We also use third party suppliers such as Facebook, Twitter and Google Analytics and these providers may use cookies. They may also use tracking pixels, which are commonly found in advertising to track the effectiveness of adverts.

As some of these services may be based outside of the UK and the European Union, they may not fall under the jurisdiction of UK courts. If you are concerned about this you can change your cookie setting (see above).

ACCESS TO YOUR PERSONAL INFORMATION

At any time, you may review or update personally identifiable information that we hold about you, by contacting our Data Protection Officer at hello@launchpadhr.co.uk.

After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

UPDATING YOUR DETAILS

We do appreciate it if you keep your details up to date. You can do so by contacting our Data Protection Officer at hello@launchpadhr.co.uk.

We may use Post Office address search, postcode lists or other available sources to confirm data that you provide us with, where, for example, we are unsure of what you have completed on a form.

We will not use these sources to create that you have chosen not to provide, for example, if you have left a telephone number blank; nor will we automatically update changes of address, we will normally only update your address when you tell us it has changed.

REMOVAL OF YOUR INFORMATION

You have the right to ask us to erase your personal data, to ask us to restrict our processing or to object to our processing of your personal data. If you wish us to remove personally identifiable information, you may contact us at hello@launchpadhr.co.uk. This may limit the service we can provide to you.

VERIFICATION OF YOUR INFORMATION

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

COMPLAINTS

If you are not happy with our privacy policy or if you have any complaint then you should inform the Data Protection Officer (DPO), Mile House, Bridge End, Chester-le-Street, County Durham, DH3 3RA.

If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

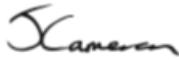
If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns/>

CHANGES TO THIS PRIVACY NOTICE

We may amend this policy from time to time to take account of changes to our processes or changes to data protection or other legislation. If we may any significant changes to this policy we will show this clearly on our website or will write to you directly. By

continuing to use our service and our website, you will be deemed to have accepted these changes.

If you have any questions about this privacy notice, please contact the Data Protection Officer, Jo Cameron, Director, Mile House, Bridge End, Chester-le-Street, County Durham, DH3 3RA, Telephone 0191 3037775. hello@launchpadhr.co.uk.

This Privacy Notice was adopted by: LaunchPad HR Ltd	Date: 9/10/2018
To be reviewed annually or in light of any changes in legislation and/or guidance.	Signed on behalf of LaunchPad HR Ltd:  Director/Manager: Print Name: Jo Cameron
Reviewed and changes made re/ LaunchPad Associates Limited as the registered company and LaunchPad HR as the Trading Company.	Beverly Sherratt Director 8/10/19