

PRIVACY NOTICE

This privacy notice is intended to provide information about the way in which Clarus Design Consultancy Limited ("Clarus") collects and processes "Personal Data".

"Personal Data" includes any information about an individual from which that person can be identified. Special categories of Personal Data includes details about a person's race, ethnicity, sex life, sexual orientation, religious or philosophical beliefs, political opinions, trade union membership, and health/genetic/biometric data. Clarus may, in limited circumstances, collect information about a person's criminal convictions/offences, for example, when required for legal or regulatory purposes.

This privacy notice is issued by Clarus as "data controller", in other words, as the organisation which determines the purposes for which, and the manner in which, any Personal Data is, or is likely to be, processed.

This privacy notice covers Clarus's processing the Personal Data:

- of persons who have applied for positions with Clarus;
- when providing facilities to visitors ("Visitor Services");
- when providing products and services to existing and prospective clients, including their staff ("Client Services") and/or suppliers or service providers, including their staff ("Supplier Services); and
- when providing the Personal Data of any legal entity or individual as a candidate for a position at Clarus ("Recruitment Activity").

Clarus collects Personal Data, by means of direct interaction such as telephone (including identity information provided to Clarus's switchboard), email/postal/in-person contact (including meetings, conferences, social events etc), as well as by referring to publicly available sources such as registers and government authorities.

Clarus processes Personal Data for legal and regulatory purposes, to assess ways in which it can assist a client or potential client in a particular matter and in the course of assisting a client or potential client in a particular matter.

Clarus may use data in respect of a person's identity, contact details, work, work history, finances and requested services where it is necessary for: the performance of a contract; compliance with a legal/regulatory obligation; the protection of Clarus's or Clarus's actual or potential clients' legitimate interests (provided that the data subject's basic rights do not override such interests); and where Clarus has been provided with consent in respect of processing Personal Data (although Clarus does not normally rely on consent as the legal basis for processing Personal Data).

Whilst Clarus will not share Personal Data with any organisations outside of Clarus for marketing purposes, it may share Personal Data with other parties under the following circumstances for the purposes for which the Personal Data was collected and at all times subject to our professional obligations and applicable terms of business:

- when required or requested by any court of competent jurisdiction or by any governmental, taxation or other regulatory authority, law enforcement agency or similar body;
- when required or requested by any financial institutions providing finance to Clarus;
- when required or requested by external auditors;
- when required or requested by Clarus's professional advisers or consultants; and
- when required or requested by service providers who provide information technology and system administration services to Clarus.

Clarus requires any person/entity to whom the Personal Data is disclosed to respect the confidentiality and security of such Personal Data and to treat it in accordance with applicable laws and regulations. We do not allow such recipients of your Personal Data to use it for their own purposes, and we only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

Where Clarus uses parties outside of the EEA to process Personal Data on its behalf, Clarus will ensure that such Personal Data is sent to countries that have been deemed to provide an adequate level of protection for Personal Data by the European Commission; and where Clarus uses providers based in the US, it will transfer Personal Data to them only if they are certified under the EU-US Privacy Shield.

Clarus takes data security very seriously and will take every practicable measure to ensure its implementation.

Clarus will only retain Personal Data for as long as necessary (considering factors such as the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of the Personal Data, the purposes for which Clarus processes Personal Data and whether those purposes through other means) to fulfil the purposes for which it was collected including compliance with legal/regulatory/accounting/reporting requirements and to carry out the work for which Clarus has been engaged by a client.

Clarus respects each data subject's right: to be informed about how Personal Data is used; to access Personal Data; to have inaccurate Personal Data rectified; to have Personal Data erased in some circumstances ("the right to be forgotten"); to restrict processing of Personal Data in some circumstances; to data portability; and not to be subject to automated decisions where the decision produces a legal effect or a similarly significant effect.

Maryam Meddin oversees compliance with data protection within Clarus. Any questions (including those in respect of relevant rights) about the Personal Data held by Clarus, or complaints in respect of Clarus's processing of Personal Data may be addressed by email to maryam@clarus-design.com telephoning (+44) 20 3735 9346. You may also address any complaints by contacting your local data protection authority.

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