



Flourish Marketing & Flourish Business Solutions

Privacy and Data Protection Policy May 2018

Who we are

Flourish Marketing and Flourish Business Solutions are the trading names of Flourish Marketing Limited, a marketing and management consulting agency registered at 31 Stamperland Crescent, Glasgow, G76 8LH.

Background

This privacy and data protection policy lets you know what happens to any personal data that you give to us, or any that we may collect from or about you in carrying out our duties as marketing and management consultants. It applies to all products and services, and instances where we collect your personal data.

Our commitment

Flourish Marketing and Flourish Business Solutions are fully committed to handling personal information in accordance with data protection legislation and best data handling practices. This means that your personal information will be:

1. Processed lawfully, fairly and in a transparent manner
2. Collected for specified, explicit and legitimate purposes
3. Only collected so far as required for our lawful purposes
4. As accurate and up to date as possible
5. Retained for a reasonable period of time, in accordance with retention policies
6. Processed in a manner which ensures an appropriate level of security

Whether through this notice or otherwise, we hope to ensure that everyone has a good understanding of why Flourish Marketing and Flourish Business Solutions process personal information and, where we do, the rights they may have.

Why do we need to process or hold personal data?

In order to provide contracted services with clients we need to process personal data to undertake market analysis, help review business objectives, deliver marketing and management consultancy services, help recruit staff for clients and support clients in effectively structuring their marketing functions in accordance with proposal and engagement letters with our clients.

How do we collect personal information?

Like most organisations that handle personal information, there are various ways in which Flourish Marketing and Flourish Business Solutions collect information from and about the people we deal with:

- From you directly, and from other colleagues within your company via email and written correspondence, telephone discussions and at face to face meetings
- Client engagement forms when we start working with you and other information requests
- Visitors to our websites: www.flourishmarketing.co.uk and www.flourishbusinessolutions.co.uk
- Information generated about you when you engage our marketing business services
- Business partners (for example, creative agencies, digital agencies) or others who are a part of providing your services or operating our business
- From other sources such as Companies House, HMRC, DWP, publicly available directories and information (for example, telephone directory, social media, internet, news articles)

What kinds of personal information about you do we collect?

Personal information that we'll process in the delivery of our marketing and management consultancy business services includes:

a) Clients

- **Personal and contact details**, such as title, full name, contact details, social media accounts where we link with you and contact details history
- **Records of your contact with us** such as via email, telephone and face to face meetings
- **Financial information** for your company detailing associated payment methods and invoices raised because we have received payments from you for work undertaken
- **Your usage of our services**: records of marketing services provided for you, relevant correspondence relating to the delivery of those services plus any testimonials you may have provided for us
- **Imagery**, where you have provided this for our use in delivering marketing services on your behalf, or where we have commissioned this for your use
- **Insights about your customers** gained from analysis or profiling of anonymised data provided by you about your customers on your behalf

b) Service providers or interested third parties

- **Personal and contact details**, such as title, full name, contact details, social media accounts where we link with you and contact details history
- **Financial information**: bank account and sort code to enable settlement of invoices for work delivered at our request
- **Qualifications and professional experience**
- **Your delivery of services on our behalf**: records of marketing services provided by you, relevant correspondence relating to the delivery of those services

What do we use your personal data for?

We use your personal data, including any of the personal data listed above, for the following purposes:

- 
- Assessing feasibility of working with you either as a client or service provider, what are the most appropriate marketing services for your business, the price, the risk of doing so, availability of payment method and the terms
 - Management of all aspects of the marketing and management consultancy services we deliver for you
 - To improve the operation of our business and that of our business partners
 - To follow guidance and best practice under the change to rules of governmental and regulatory bodies
 - For management and auditing of our business operations including accounting
 - To monitor and to keep records of our communications with you
 - To comply with legal and regulatory obligations, requirements and guidance
 - To provide insight and analysis of our customers both for ourselves and for the benefit of business partners so we can improve our service offering
 - To share information, as needed, with our service providers (such as creative, digital or research agencies, accountant) as part of providing and administering our services or operating our business

What is the legal basis for our processing of your personal information (including when we share it with others)?

We rely on the following legal bases to use your personal data:

a) Contractual purposes:

We need to collect your personal information so that we can manage the agreed schedule of work with you:

- Set up and administer your account with us
- ensure correct invoicing and appropriate payment for marketing and management consultancy services delivered
- ensure we can access the required information in order to deliver effective marketing and management consultancy advice
- send you communications by post or email in relation to essential elements of our work with you

If you do not provide us with all of the personal information that we need to collect then this may affect our ability to offer the above services.

b) Legitimate interest:

We also process our clients personal information in pursuit of our legitimate interests to:

- For management and audit of our business operations including accounting
- To carry out monitoring and to keep records of our communications with you and our staff
- For market research and analysis and developing statistics
- To help us improve products or services, or to assess or to improve the operating of our business

- 
- Where we need to share your personal information with third parties in order to run our business or comply with any legal and/or regulatory obligations
 - Share case studies of work undertaken for you in order to increase awareness of the services that Flourish Marketing and Flourish Business Solutions provide
 - Events and activities which we undertake from time to time for clients may be photographed or filmed and your personal information maybe used in images captured from those events which we use for promotional purposes

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us on data@flourishmarketing.co.uk

Does Flourish Marketing and Flourish Business Solutions share data with third parties?

Some of the processing activities set out above may require us to share personal information with third parties. Whenever we share personal data, we take all reasonable steps to ensure it will be handled appropriately and securely by the third party. The following is a list of the main third parties with whom Flourish Marketing and Flourish Business Solutions may share personal information:

- Oversight regulators and statutory bodies (e.g HMRC, IDM)
- Our bank: HSBC
- Third party service providers who support some of our business functions, including:
 - Tartan Thistle
 - Forty Design
 - Jude Henderson PR
 - Ad-Box
 - Virtually Jules
 - Gold CA
- Software providers which allow Flourish Marketing and Flourish Business Solutions to operate efficient digital processes, including:
 - DropBox
 - Microsoft Office 2016
 - Microsoft Outlook
 - EventBrite
 - GoogleAdBox
 - Google Analytics
 - LinkedIn, Twitter, Facebook, Instagram and other social media platforms
 - Hootsuite
 - PracticeWeb
 - JustHost
 - Wix
 - UKChanges
 - Canva
 - Wetransfer
 - Wordpress



For practical reasons, this is an indicative, but not exhaustive list. Please also note that the list may be updated from time to time.

For how long is your personal information retained by us?

Unless we explain otherwise to you, we'll hold your personal information based on the following criteria:

- For as long as we have reasonable business needs, such as managing our relationship with you and managing our operations
- For as long as we provide goods and/or services to you and then for as long as someone could bring a claim against us; and/or
- Retention periods in line with legal and regulatory requirements or guidance.

Where does Flourish Marketing and Flourish Business Solutions store your personal data?

Personal information is mainly processed by us at:

- our registered address
- our operating address: Sheddens Mews, 119A Busby Road, Glasgow, G76 8BD
- at your offices, when we are contracted to work on site for you
- at the offices of our appointed third party service providers listed above

To allow us to operate efficient digital processes, we sometimes need to store information in servers located outside the UK, but never without first ensuring that they are compliant with GDPR.

What are your rights when we are processing or controlling your personal information?

Here is a summary list of the rights that all individuals have under data protection laws.

- Access to your information – you have the right to request a copy of the personal information about you that Flourish Marketing and Flourish Business Solutions holds
- Correcting your information – we want to make sure that your personal information is accurate, complete, and up to date, and so you may ask us to correct any personal information about you that you believe does not meet these standards.
- Deletion of your information – You have the right to ask Flourish Marketing and Flourish Business Solutions to delete personal information about you where:
 - You consider that we no longer require the information for the purposes for which it was obtained
 - Flourish Marketing and Flourish Business Solutions is using that information with your consent and you have withdrawn your consent – see ‘withdrawing consent to using your information’ below.
 - You have validly objected to our use of your personal information – see ‘objecting to how we may use your information’ below.
 - Flourish Marketing and Flourish Business Solutions’ use of your personal information is contrary to law or our other legal obligations.

- Objecting to how we may use your information – you have the right at any time to require Flourish Marketing and Flourish Business Solutions to stop using your personal information for direct marketing purposes.
- Restricting how we may use your information – in some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold, or assessing the validity of any objection you have made to Flourish Marketing and Flourish Business Solutions' use of your information. The right might also apply if we no longer have a basis for using your personal information but you don't want us to delete the data. Where this right is validly exercised, Flourish Marketing and Flourish Business Solutions may only use the relevant personal information with your consent, for legal claims, or where there are other public interest grounds to do so.
- Withdrawing consent using your information – where we use your personal information with your consent, you may withdraw that consent at any time, and we will stop using your personal information for the purpose(s) for which consent was given.

Please contact Flourish Marketing and Flourish Business Solutions by email at data@flourishmarketing.co.uk or in writing to our office at 31 Stamperland Crescent, Glasgow, G76 8LH if you wish to exercise any of these rights.

Changes to this policy

Flourish Marketing and Flourish Business Solutions keep this notice under regular review and clients will be contacted of any changes to this policy. Paper copies of the privacy statement may also be obtained by emailing data@flourishmarketing.co.uk or in writing to our office at 31 Stamperland Crescent, Glasgow, G76 8LH.

This privacy statement was last updated on 21 May 2018.

Complaints

While Flourish Marketing and Flourish Business Solutions seek to resolve directly all complaints about how we handle personal information, you also have the right to lodge a complaint with the Information Commissioner's Office, whose contact details are as follows:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone - 0303 123 1113 (local rate) or 01625 545 745

Website - <https://ico.org.uk/concerns>