#### PRIVACY POLICY

#### 1. PURPOSE

This policy describes how we collect and use personal data about you, in accordance with the General Data Protection Regulation (GDPR), and any applicable national laws, regulations and secondary legislation in the UK relating to the processing of personal data and the privacy of electronic communications, as amended, replaced or updated from time to time in the UK ('Data Protection Legislation').

Please read the following to understand our practices regarding your personal data and how we will treat it.

#### 2. ABOUT US

The PA Association is a social organisation for people who have been previously employed by PA Consulting Group. Our aim is to help members keep in contact with past PA colleagues, enjoy social events share news, and hear what has been happening at PA.

For the purpose of the Data Protection Legislation and this policy, we are the 'data controller'. This means that we are responsible for deciding how we hold and use personal data about you. We are required under the Data Protection Legislation to notify you of the information contained in this privacy policy.

We have appointed a Data Protection Officer. Our Data Protection Officer is our Data Protection Point of Contact and is responsible for assisting with enquiries in relation to this privacy policy or our treatment of your personal data. Should you wish to contact our Data Protection Point of Contact you can do so using the contact details noted at paragraph 12 (Contact Us), below.

#### 3. HOW WE MAY COLLECT YOUR PERSONAL DATA

We obtain personal data about you when:

- you join The PA Association;
- you contact us by email, telephone, or post, or
- a close friend or relative of yours contacts us on your behalf if you are unable to contact us yourself, or
- PA Consulting Group passes us information if they are authorised by you to do so.

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email: info@pa-association.org website: www.pa-association.org

## 4. THE KIND OF INFORMATION WE HOLD ABOUT YOU

The information we hold about you may include the following:

- your contact details, such as your name, address, date of birth, PA employment years, telephone number and email address;
- your preferences for which of your contact details you would like us to share with other members of The PA Association;
- our correspondence and communications with you...

#### 5. HOW WE USE PERSONAL DATA WE HOLD ABOUT YOU

We may process your personal data to encourage and support social interaction between members.

We may process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, business development, statistical and management purposes.

We may process your personal data for certain additional purposes with your consent, and in these limited circumstances where your consent is required for the processing of your personal data then you have the right to withdraw your consent to processing for such specific purposes.

We may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

a. Situations in which we will use your personal data

We may use your personal data in order to:

- provide our services;
- provide you with information related to our services, events and activities that you request from us or which we feel may interest you;
- seek your thoughts and opinions on the services we provide; and
- notify you about any changes to our services.

In some circumstances we may anonymise or pseudonymise the personal data so that it can no longer be associated with you, in which case we may use it without further notice to you.

If you refuse to provide us with certain information when requested, we may not be able to deliver our services to you.

We may also process your personal data without your knowledge or consent, in accordance with this policy, where we are legally required or permitted to do so.

## b. Data retention

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected.

#### 6. DATA SHARING

a. Why might you share my personal data with third parties?

We will share your personal data with third parties where we are required by law, where it is necessary to administer the relationship between us or where we have another legitimate interest in doing so.

b. Which third-party service providers process my personal data?

"Third parties" includes third-party service providers. The following activities are carried out by third-party service providers: IT and cloud services, professional advisory services, administration services, marketing services and banking services.

All of our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

c. What about other third parties?

We may need to share your personal data with a regulator or to otherwise comply with the law.

# 7. TRANSFERRING PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)

We will not transfer the personal data we collect about you outside of the EEA.

## 8. DATA SECURITY

We have put in place commercially reasonable and appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## 9. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

a. Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us, using the contact details below.

b. Your rights in connection with personal data

Under certain circumstances, by law you have the right to:

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
- Request correction of the personal data that we hold about you.
- Request erasure of your personal data. This enables you to ask us to delete or remove
  personal data where there is no good reason for us continuing to process it. You also
  have the right to ask us to delete or remove your personal data where you have
  exercised your right to object to processing (see below).
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this basis.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.

If you want to exercise any of the above rights, please email our data protection point of contact at email info@pa-association.org.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## 10. RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to direct marketing that you have indicated you would like to receive from us), you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please email our data protection point of contact at email info@ pa-association.org.

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## 11. CHANGES TO THIS PRIVACY POLICY

This privacy policy was last updated on 22 May 2018.

#### 12. CONTACT US

If you have any questions regarding this policy or if you would like to speak to us about the manner in which we process your personal data, please email our Data Protection Point of Contact David Roffey, at email info@pa-association.org.

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time. The ICO's 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