

Privacy Policy

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1. Introduction

- 1.1 **Purpose and Scope:** Aaran Beattie Solutions Limited ("ABS," "we," "us," or "our") is committed to protecting the privacy and security of the personal information we collect and process. This Privacy Policy outlines how we collect, use, disclose, and safeguard your information when you engage with our business advisory and consulting services, access our website, or interact with us through other channels.
- 1.2 **Consent and Agreement:** By accessing or using our services, website, or other channels, you acknowledge that you have read, understood, and agree to be bound by the terms of this Privacy Policy and our Standard Terms and Conditions. If you do not agree with our policies and practices, please do not use our services or access our website.
- 1.3 **Compliance With Applicable Laws:** We are committed to complying with all applicable data protection and privacy laws, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. We will only collect, use, and disclose your personal information in accordance with these laws and as set out in this Privacy Policy.
- 1.4 **Data Controller:** ABS is the data controller responsible for the collection, use, and disclosure of your personal information as described in this Privacy Policy. If you have any questions or concerns about our data practices, please contact us using the information provided in the "Contact Us" section below.
- 1.5 **Third-Party Links and Services:** Our website may contain links to third-party websites, applications, or services that are not owned or controlled by ABS. This Privacy Policy does not apply to these third-party services, and we encourage you to review the privacy policies of those third parties before providing any personal information.

Please note that ABS has no control over the content, privacy policies, or practices of any third-party websites or services. We are not responsible or liable, directly or indirectly, for any damage, loss, or other consequences caused by or related to your use of or reliance on any content, goods, or services available on or through these third-party websites or services. By accessing or using third-party links or services, you assume all associated risks and agree that ABS shall not be held responsible for any consequences arising from such use.

2. Information We Collect

- 2.1 **Personal Information:** We may collect various types of personal information from you when you engage with our services, access our website, or interact with us through other channels. The types of personal information we collect may include:
 - (a) Contact information, such as your name, email address, postal address, and telephone number.
 - (b) Business information, such as your company name, job title, and industry.
 - (c) Financial information, such as payment details and billing address.
 - (d) Communication information, such as your enquiries, requests, and feedback.
 - (e) Usage information, such as your interactions with our website, services, and other channels.

- 2.2 **Information Collected Automatically:** When you access our website or use our services, we may automatically collect certain information about your device and usage patterns. This information may include:

- (a) Device information, such as your IP address, browser type, operating system, and device type.
- (b) Usage information, such as the pages you visit, the time spent on each page, the links you click, and other actions you take while using our website or services.
- (c) Cookies and similar technologies, which are small files placed on your device to collect and store information about your preferences and navigation to, from, and on our website.

- 2.3 **Information From Third-Party Sources:** We may also collect personal information about you from third-party sources, such as publicly available databases, social media platforms, and our business partners. We may combine this information with the personal information we collect from you directly to provide you with a more personalised experience and to improve our services.

- 2.4 **Sensitive Personal Information:** We do not intentionally collect any sensitive personal information, such as information about your health, race, ethnicity, religious beliefs, or political opinions. If you choose to provide us with sensitive personal information, we will process it in accordance with applicable laws and this Privacy Policy.

- 2.5 **Information About Children:** Our services are not directed to children under the age of 13. We do not knowingly collect personal information from children. If we become aware that we have inadvertently collected personal information from a child under the age of 13, we will take steps to delete such information as soon as possible.

3. How We Use Your Information

- 3.1 **Provision and Improvement of Services:** We use the personal information we collect to provide, maintain, and improve our business advisory and consulting services. This includes using your information to:

- (a) Respond to your enquiries, requests, and feedback.
- (b) Process your orders and transactions.
- (c) Provide customer support and assistance.
- (d) Customise and improve your experience with our services.
- (e) Develop new products, services, and features.

- 3.2 **Communication and Marketing:** We may use your personal information to communicate with you about our services, promotions, or other relevant information. This may include:

- (a) Sending you newsletters, updates, and marketing communications.
- (b) Inviting you to participate in surveys, events, or other promotional activities.
- (c) Providing you with targeted advertisements and content based on your interests and preferences.

You can opt out of receiving marketing communications at any time by following the unsubscribe instructions provided in the communication or contacting us directly.

- 3.3 **Legal and Compliance:** We may use your personal information to comply with applicable laws, regulations, and legal processes, such as responding to subpoenas, court orders, or other legal requests. We may also use your information to enforce our terms and conditions, protect our rights, privacy, safety, or property, and to defend against legal claims.

- 3.4 **Aggregated and Anonymised Data:** We may aggregate and anonymise your personal information to create statistical data and

insights that do not identify you personally. We may use this aggregated and anonymised data for various purposes, including analysing usage trends, measuring the effectiveness of our services, and improving our offerings.

- 3.5 **Consent and Legitimate Interests:** In some cases, we may process your personal information based on your explicit consent or our legitimate interests, as permitted by applicable laws. When we process your information based on legitimate interests, we ensure that our interests do not override your fundamental rights and freedoms.

4. Information Sharing and Disclosure

- 4.1 **Service Providers:** We may share your personal information with third-party service providers who assist us in delivering our services and operating our business. These service providers may include:

- (a) IT and hosting providers who support our website and digital infrastructure.
- (b) Payment processors who facilitate transactions on our behalf.
- (c) Marketing and advertising partners who help us deliver targeted content and advertisements.
- (d) Analytics and research providers who help us understand and improve our services.

These service providers are contractually obligated to maintain the confidentiality and security of your personal information and are prohibited from using your information for any purpose other than providing services to ABS.

- 4.2 **Business Transfers:** In the event of a merger, acquisition, reorganisation, bankruptcy, or other sale of all or a portion of our assets, your personal information may be transferred to the acquiring entity as part of the transaction. We will take reasonable steps to ensure that your rights and freedoms are protected and that the receiving entity processes your personal information in a manner consistent with this Privacy Policy.

- 4.3 **Legal Disclosures:** We may disclose your personal information if required to do so by law or in response to valid requests by public authorities, such as to meet national security or law enforcement requirements. We may also disclose your information if we believe it necessary to:

- (a) Comply with a legal obligation.
- (b) Protect and defend the rights, property, or safety of ABS, our clients, or others.
- (c) Prevent or investigate possible wrongdoing in connection with our services.
- (d) Enforce our terms and conditions or other agreements.

- 4.4 **Consent and Opt-Out:** Except as described in this Privacy Policy, we will not share your personal information with third parties without your explicit consent. If we intend to use your personal information for a purpose that is incompatible with the purposes described in this Privacy Policy, we will provide you with an opportunity to opt-out of such use.

5. Data Retention

- 5.1 **Retention Period:** We will retain your personal information for as long as necessary to fulfil the purposes for which it was collected, including providing our services, complying with legal obligations, resolving disputes, and enforcing our agreements. The specific retention period may vary depending on the nature of the information and the context in which it was collected.

- 5.2 **Determination of Retention Period:** To determine the appropriate retention period for personal information, we consider several factors, including:

- (a) The purposes for which we process your personal information and the duration necessary to achieve those purposes.
- (b) The sensitivity of the personal information and the potential risk of harm from unauthorised use or disclosure.
- (c) The existence of any legal or regulatory requirements that dictate the retention of personal information for a specific period.
- (d) The establishment, exercise, or defence of legal claims.

- 5.3 **Deletion and Anonymisation:** After the expiration of the applicable retention period, we will either securely delete your personal information or anonymise it in such a way that it can no longer be associated with you. Anonymised data may be retained indefinitely for statistical and analytical purposes.

- 5.4 **Exceptions to Deletion:** In some circumstances, we may retain your personal information even after the expiration of the retention period if:

- (a) We are required to do so by law or regulation.
- (b) The information is necessary to exercise or defend legal claims.
- (c) There is an outstanding request from you to access, correct, or delete your personal information.
- (d) We have a legitimate business need to retain the information, such as for fraud prevention or network security.

In such cases, we will continue to safeguard your personal information and limit its use to the specific purposes for which it is being retained.

- 5.5 **Retention of Aggregated and Anonymised Data:** As mentioned in section 3.4, we may retain aggregated and anonymised data indefinitely for various purposes, as this information does not identify you personally and is not subject to the same retention limitations as personal information.

6. Data Security

- 6.1 **Technical and Organisational Measures:** We implement appropriate technical and organisational measures to ensure a level of security appropriate to the risks associated with the processing of your personal information. These measures are designed to protect your personal information from accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access.

The specific security measures we employ may include:

- (a) Encryption of personal information during transmission and storage.
- (b) Access controls and restrictions, limiting access to personal information to authorised personnel only.
- (c) Implementation of secure development practices and regular security testing of our systems and applications.
- (d) Establishment of incident response and data breach notification procedures.

- 6.2 **Third-Party Security:** We require our third-party service providers to implement similar appropriate technical and organisational measures to protect your personal information. We regularly review and assess the security practices of our service providers to ensure they meet our standards.

- 6.3 **Limitations and Risk Factors:** Despite our efforts to protect your personal information, no method of transmission over the internet or electronic storage is completely secure. We cannot guarantee the absolute security of your personal information, and any transmission of personal information is at your own risk.

It is important for you to also take responsibility for protecting your personal information. We encourage you to use strong passwords, keep your login credentials confidential, and be cautious when sharing personal information online.

- 6.4 **Notification of Data Breaches:** In the event of a data breach that compromises the security, confidentiality, or integrity of your personal information and poses a high risk to your rights and freedoms, we will notify you without undue delay. We will provide you with information about the nature of the breach, its likely consequences, and the measures we have taken or plan to take to address the breach and mitigate its potential adverse effects.

- 6.5 **Cooperation With Authorities:** We will cooperate with the relevant data protection authorities in the event of a data breach or security incident, as required by applicable laws and regulations. We will also work with these authorities to resolve any complaints or disputes regarding the processing of your personal information.

7. Your Rights

7.1 **Overview:** Under the UK GDPR and the Data Protection Act 2018, you have certain rights concerning your personal information. These rights include:

- (a) The right to access your personal information.
- (b) The right to rectify inaccurate or incomplete personal information.
- (c) The right to erase your personal information (the "right to be forgotten").
- (d) The right to restrict the processing of your personal information.
- (e) The right to data portability.
- (f) The right to object to the processing of your personal information.
- (g) The right to withdraw consent.
- (h) The right to lodge a complaint with a supervisory authority.

7.2 **Exercising Your Rights:** To exercise any of your rights, please contact us using the information provided in the "Contact Us" section below. We will respond to your request within 30 days, unless the request is particularly complex or you have made several requests, in which case we may extend the response time by up to 60 additional days.

7.3 **Verification of Identity:** To protect your privacy and security, we may require you to verify your identity before processing your request. We may ask you to provide additional information or documentation to confirm your identity and ensure that we are only disclosing your personal information to you or your authorised representative.

7.4 **Limitations and Exceptions:** In some cases, there may be limitations or exceptions to your rights, as permitted by applicable laws. For example, we may refuse your request to erase your personal information if we are required to retain it to comply with legal obligations or if it is necessary for the establishment, exercise, or defence of legal claims.

If we refuse your request, we will provide you with the reasons for the refusal and inform you of your right to lodge a complaint with a supervisory authority.

7.5 **No Fee Required:** You will not have to pay a fee to exercise any of your rights concerning your personal information. However, we may charge a reasonable fee or refuse to comply with your request if it is clearly unfounded, repetitive, or excessive.

7.6 **Third-Party Requests:** If we receive a request from a third party claiming to be your authorised representative, we will take reasonable steps to verify that the third party has the authority to make the request on your behalf. We may ask the third party to provide evidence of their authority, such as a power of attorney or a signed authorisation from you.

8. International Data Transfers

8.1 **Transfer Mechanisms:** ABS is based in the United Kingdom, and your personal information will be primarily processed within the UK. However, in some cases, we may transfer your personal information to countries outside the UK for processing. When we transfer your personal information to other countries, we will ensure that appropriate safeguards are in place to protect your rights and freedoms.

We may use one or more of the following transfer mechanisms, as permitted by applicable laws:

- (a) **Adequacy decisions:** We may transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal data by the UK government or the European Commission.
- (b) **Standard Contractual Clauses (SCCs):** We may use approved SCCs to ensure appropriate safeguards for personal data transfers to countries that have not received an adequacy decision.
- (c) **Binding Corporate Rules (BCRs):** If we transfer your personal information within our corporate group, we may rely on approved BCRs to ensure appropriate safeguards for the transfer.

(d) **Derogations:** In specific situations, we may rely on derogations, such as your explicit consent or the necessity of the transfer for the performance of a contract, to transfer your personal information to countries that do not provide an adequate level of protection.

8.2 **Third-Party Transfers:** When we share your personal information with third-party service providers located outside the UK, we will ensure that they have implemented appropriate safeguards for the transfer of your personal information, such as SCCs or BCRs, or that the transfer is based on an adequacy decision or a valid derogation.

8.3 **Your Rights and Choices:** If you have concerns about the transfer of your personal information to countries outside the UK, please contact us using the information provided in the "Contact Us" section below. We will provide you with information about the specific transfer mechanism we use and your available rights and choices.

8.4 **Compliance With Local Laws:** Regardless of where your personal information is transferred, we will ensure that it is processed in accordance with this Privacy Policy and applicable data protection laws. If there is a conflict between this policy and the laws of the country where your personal information is transferred, we will comply with the local laws to the extent necessary.

9. Updates to This Policy

9.1 **Reasons for Updates:** We may update this Privacy Policy from time to time to reflect changes in our data practices, services, or legal obligations. Some reasons we may update this policy include:

- (a) Changes in applicable data protection laws and regulations.
- (b) Introduction of new services or changes to existing services.
- (c) Improvements in our data processing practices or security measures.
- (d) Feedback from our clients or other stakeholders.

9.2 **Effective Date:** The updated Privacy Policy will take effect on the date specified on the policy itself. Your continued use of our services or website after the effective date constitutes your acceptance of the updated policy.

9.3 **Reviewing Changes:** We encourage you to review the Privacy Policy periodically to stay informed about how we collect, use, and protect your personal information. The date of the last update will be clearly indicated at the top of the policy.

9.4 **Accessing the Current Policy:** The current version of our Privacy Policy will always be available on our website. We recommend that you check the policy regularly to ensure you are aware of any changes and how they may affect you.

9.5 **Prior Versions:** If you would like to access prior versions of our Privacy Policy, please contact us using the information provided in the "Contact Us" section below. We will maintain an archive of previous versions of this policy for your reference.

10. Contact Us

10.1 **Contact Information:** If you have any questions, concerns, or requests regarding this Privacy Policy or our data processing practices, please contact us using the following information:

Aaran Beattie Solutions Limited
Address: 272 Bath Street, Glasgow, G2 4JR, United Kingdom
Email: contact@aaaranbeattiesolutions.com

10.2 **Complaints:** If you believe that we have not adequately addressed your privacy concerns or that we have infringed upon your data protection rights, you have the right to lodge a complaint with the relevant supervisory authority. In the UK, the supervisory authority is the Information Commissioner's Office (ICO). You can find more information about how to lodge a complaint on the ICO's website: <https://ico.org.uk/make-a-complaint>.

10.3 **Dispute Resolution:** In the event of a dispute regarding our data processing practices or your rights under this Privacy Policy, we will attempt to resolve the issue through direct communication and cooperation with you. If we are unable to reach a resolution, we may consider alternative dispute resolution mechanisms, such as mediation or arbitration, as a means of resolving the dispute.

10.4 **Feedback and Suggestions:** We value your feedback and suggestions on how we can improve our Privacy Policy and data

processing practices. If you have any ideas or recommendations, please feel free to contact us using the information provided above. We will carefully consider your input and make changes to our policy or practices where appropriate.