

# PRIVACY POLICY

(Website and Cookies)

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1.0	15 June 2020	Policy first draft	Lewis Gill, Andrew Stark

## Approval

(By signing below, all Approvers agree to all terms and conditions outlined in this Agreement.)

Approver Name	Job Title	Signed	Date
Lewis Gill	Founder & Managing Director		15 June 2020
Daniel Lee-Burnsall	Founder & Commercial Director		15 June 2020

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## **Policy Statement**

At Incremental Solutions Limited we are committed to protecting your privacy. This policy applies when we are acting as a controller of personal data, i.e. where we have determined the purposes and means of the processing of that personal data. It applies to all users of our website

<https://www.incrementalsolutions.co.uk/>

## **Data we collect**

Our website ([www.incrementalsolutions.co.uk](http://www.incrementalsolutions.co.uk)) does not have a data capture form, however we may capture data when you contact us.

We may process your personal data for the purpose of contacting you if you submit an enquiry using our website. The legal basis for this processing is that it is necessary to achieve our legitimate interest, namely the promotion of our products and services.

## **Information we collect automatically**

We also process your cookies for the purpose of optimising our website and improving the users' experience. This is in relation to images and display formats. The legal basis for this processing is your consent. See below for more information on the cookies that we use. If you do not allow cookies, please note that some parts of this website may become inaccessible or not function properly.

## **Data use – grounds for using your data**

In the event of you contacting us, we will use your data for the purpose of direct communication in relation to your interest in our products and services.

Should a business relationship be formed, or a future opportunity is identified, then your professional details are kept on our secure Content Management System ("CMS") and reviewed on a minimum six-month basis.

Data which is determined to be within the public domain, such as company name, location and telephone number, will be held indefinitely.

We will use your data to:

- Communicate with you
- Communicate with your organisation

## **Sharing and disclosure**

We will share your personal data with third parties only to the extent that the disclosure is reasonably necessary for the purposes of providing you with the information about our products/services that you have requested.

## Individual rights

If you are providing us with your personal data, it is important to us that you are aware of the following rights that you have in relation to our processing of that personal data.

- You can be provided with a copy of any personal data concerning you that we process, unless that would affect the rights and freedoms of others. You can also be provided with information on how that personal data is processed by us.
- You can have us rectify any personal data of yours that we hold that is inaccurate or incomplete. In certain circumstances, you can also ask us to erase or restrict the use of any of your personal data that we process.
- You can object at any time to our processing of your personal data on grounds related to your particular situation.
- You can object at any time to our processing of your personal data for direct marketing purposes.
- You can exercise any of the rights listed above by contacting us using the details at the bottom of this notice. If you are unhappy with any aspect of how we processed your personal data or your request to exercise a right, you can lodge a complaint with the Information Commissioner's Office.

# COOKIE POLICY

## **What are cookies and how do they work?**

“Cookies” are text-only pieces of information that a website transfers to an individual’s hard drive or other website-browsing equipment for record-keeping purposes. Cookies allow the website to remember important information that will make your use of the site more convenient. A cookie will typically contain the name of the domain from which the cookie has come, the “lifetime” of the cookie, and a randomly generated unique number or other value. Like most websites, we use different categories of cookies for a variety of purposes in order to improve your online experience.

Depending on the purpose, we use session cookies, which are temporary cookies that remain in the cookie file of your browser until you leave the site, and persistent cookies, which may remain in the cookie file of your browser for 12 months.

## **What are the categories of cookies?**

Cookies can be categorised, following the International Chamber of Commerce guide, as follows:

### **Strictly necessary cookies**

‘Strictly necessary cookies’ tend to be session cookies which are deleted at the end of the browser session.

Accepting these cookies is a condition of using the website, so if you prevent these cookies we can’t guarantee how our website will perform during your visit.

### **Performance Cookies**

‘Performance cookies’ collect information about how you use our website such as which pages you visit and if you experience any errors. These cookies don’t collect any information that could identify you – all the information is collected on an anonymous aggregate basis and is only used to help us improve how our website works, understand what interests our users and measure the effectiveness of our advertising. They also enable us to track the total number of visitors to our site. Most performance cookies tend to be session cookies which are deleted at the end of the browser session.

In some cases, some of these cookies are managed for us by third parties, but we don’t allow the third party to use the cookies for any purpose other than those listed above. Some of these third-party performance cookies are persistent cookies.

### **Functionality Cookies**

Functionality cookies, by their very nature, are persistent cookies so that we remember your computer when you return to our website.

Some of these cookies are managed for us by third parties – where this is the case we don't allow the third party to use the cookies for any purpose other than those listed above.

### **Targeting Cookies**

We use Google Analytics (<https://analytics.google.com/analytics/web/#/>) which uses cookies and record your visit to our website, the pages you have visited, the links you have followed, your country or origin and browser type. We will use this information to make our website and the content displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

### **How can I block and/or delete cookies?**

Use the options in your web browser if you do not wish to receive a cookie or if you wish to set your browser to notify you when you receive a cookie. You can easily delete any cookies that have been installed in the cookie folder of your browser.

You can withdraw your consent to our processing of cookies at any time by changing the settings on your internet browser. (See this article from Google for help:

<https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=en>)

### **Security**

We believe we use reasonable administrative, logical, physical and managerial measures to safeguard your personal information against loss, theft and unauthorised access, use and modification.

### **Changes to the Policy**

We may change this policy from time to time, and if we do we'll post any changes on this page. If you continue to visit our website after those changes are in effect, you agree to the revised policy. If the changes are significant, we may provide more prominent notice or get your consent on the new policy.

### **GDPR compliance**

Data safety is incredibly important to us. We always ensure your data is managed ethically and transparently, so you're never in the dark when it comes to data you give us. We only hold your data for the purpose of communication, and you always have the right to ask us about the data we hold about you.

### **Contacting us**

If you have any questions or comments about this policy, we are contactable by email at [contact@incrementalsolutions.co.uk](mailto:contact@incrementalsolutions.co.uk).