

Astute Consulting

Privacy Statement

About

We respect your right to privacy and take seriously our responsibilities in relation to the processing of personal data. We do not collect or process personal data unnecessarily.

This privacy statement sets out important information about your rights in relation to the processing of your personal data, and the basis on which any personal data we collect from you, or that you provide to us, will be processed in connection with your use of our website and our services.

Under this policy, we adhere to the principles of the General Data Protection Regulation (EU) 2016/679 (the “GDPR”) of the personal data you provide to us.

What information do we collect about you?

We collect information about you when you instruct us to provide advice; visit our website; subscribe to our newsletters, receive our publications, apply for employment with us, attend one of our seminars and / or engage in business dealings with us.

The information you give us during your dealings with us may include:

- **Identity Data:** your full name, address, e-mail address, phone number, address, age, identification, title and personal description.
- **Financial Data:** your financial, including bank account details, billing contact email address and VAT number.

The information we automatically collect about you

When you visit our website, a record of your visit is made. That data is used completely anonymously, to determine the number of people who visit our website and the most frequently used sections of the site. This enables us to continually update and refine the site. If you use any forms on the website to send an email to us, a record will also be made of your email address and your telephone number.

No special categories of personal data

We do not require or collect any personal data that is your sensitive personal data or any special category of personal data under the GDPR, unless you decide to provide this information to us.

Cookies

We do not currently use Cookies on our website.

Where is the information stored?

We store information in several different ways, some may be physical in which case it is stored securely in access-controlled areas within our offices, or electronically in which case we utilise the services of cloud server providers which are currently based within the EEA.

We endeavour to ensure these providers comply with the regulations and best practices of Data Protection and Privacy.

How will we use the information about you?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter or have entered with you.
- Where it is necessary for our legitimate interest (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

We have set out below, in table format, a description of the ways we utilise your personal data and the legal basis for doing so. We have also identified our legitimate interests where appropriate:

Purpose/Activity	Legal basis for processing
To respond to your queries and to provide you with the information you request from us in relation to our Services.	<ul style="list-style-type: none">– Necessary for our legitimate interests (to respond to new or existing customer queries and grow our business)– Performance of a contract with you– Necessary to comply with a legal obligation
To provide our Services to you.	<ul style="list-style-type: none">– Necessary for our legitimate interests (to respond to new or existing customer queries and grow our business)– Performance of a contract with you– Necessary to comply with a legal obligation
To manage payments, fees and charges and to collect and recover money owed to us.	<ul style="list-style-type: none">– Performance of a contract with you– Necessary for our legitimate interests (to recover debts due to us)– Necessary to comply with a legal obligation

To manage our relationship with you, including notifying you about changes to our Services or our Privacy Policy.	<ul style="list-style-type: none"> – Performance of a contract – Necessary to comply with a legal obligation – Necessary for our legitimate interests (to keep our records updated and to study how customers use our products and services).
To provide you with information about services we offer that are like those that you have enquired about.	Necessary for our legitimate interests (to develop our products or services and grow our business)
Where you have given us your consent to do so, to provide you with information about other services we feel may interest you.	Consent
To ensure that content is presented in the most effective manner for you and for your computer or device.	Necessary for our legitimate interests (to keep our Site and the Services updated and relevant and to develop and grow our business).
To administer and protect our business, our Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.	Necessary for our legitimate interests (for running our business and as part of our efforts to keep our Site and the Services safe and secure).
To use data analytics to improve or optimise our Site, marketing, customer relationships and experiences.	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our Site and the Services updated and relevant, to develop and grow our business and inform our marketing strategy).
To measure or understand the effectiveness of advertising we serve to you and others, and, where applicable, to deliver relevant advertising to you.	Necessary for our legitimate interests (to study how customers use our products or Services, to develop them, to grow our business and to inform our marketing strategy).

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the

new purpose is compatible with the original purpose, please contact us at michele@astute.ie. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with this Policy, where this is required or permitted by law.

How long we keep your information

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. This means that the period for which we store your personal data may depend on the type of data we hold. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. For more information about our data retention policies please contact us at michele@astute.ie

Will we disclose your data?

We do not sell your personal information to third parties for marketing purposes. We may disclose information to third parties if you consent to us doing so as well as in the following circumstances:

You agree that we have the right to share your personal information with the following recipients or categories of recipients:

- Any department or authorised person within our company.
- Selected third parties including:
 - business partners, suppliers and sub-contractors for the performance of any contract we enter with them or you in relation to our Services;
 - analytics and search engine providers that assist us in the improvement and optimisation of our Site;

We will disclose your personal information to third-party recipients:

- in the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of our business or assets.
- if **Astute Consulting** or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- if we are under a duty to disclose or share your personal data in order to comply with any law, legal obligation or court order, or in order to enforce rights under the GDPR or other agreements.

- to protect our rights, property or safety, our customers, or others. This includes exchanging information with other companies and organisations for the maintenance and security of the Site and Services.

International Transfers

Personal Data may be transferred to our trusted partners and service providers who maintain their servers outside of the European Economic Area (“EEA”), where the privacy and data protection laws may not be as protective as those in your jurisdiction. This is only for the purposes of providing, and to the extent necessary to provide our Services to you. There are special requirements set out under Chapter V of the GDPR (with which we would comply) to regulate such data transfers and ensure that adequate security measures are in place to safeguard and maintain the integrity of your personal data on transfer. For more information about this and the safeguards in place relating to the transfer, please contact us by email at us_michele@astute.ie

Security Measures

We take our Data Security responsibilities seriously, employing the most appropriate physical and technical measures necessary, including staff awareness and training on Data Awareness and Privacy. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

Although we endeavour to safeguard your personal data, we cannot guarantee the security of data transmitted to us by means of email, or any such transmission of electronic data. 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 personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Your Personal Data and your Right

Accessing your Personal Data

Under article 15 of the GDPR you have a right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information please email michele@astute.ie. We will need to verify your identity and may request more information or clarifications from you to help us locate and provide you with the personal data requested.

Other Data Subject Rights

In compliance with the GDPR we will respond to requests from Data Subjects in relation to the following rights:

- The right to rectification (Article 16 & 19 of the GDPR)
- The right to erasure / the right to be forgotten (Article 17 & 19 of the GDPR)
- The right to data portability (Article 20 of the GDPR)
- The right to object (Article 21 of the GDPR)
- The right of restriction (Article 18 of the GDPR)
- Rights in relation to automated decision making, including profiling (Article 22 of the GDPR)

The rights listed above are personal rights and are exercisable only by the individual person (or data subject) concerned. To exercise any of these rights, at any time, please contact email us at michele@astute.ie

Marketing Communications

We will not use your data to send marketing communications to you about promotions, competitions, updates and new products or services that may be of interest to you, unless we have your permission to do so.

Your right to amend or object.

You have the right to amend or object to the processing of your personal data for our marketing purposes. To amend or object or if you change your mind at any later time, you can withdraw your consent to the processing of your personal data for such marketing purposes by contacting us at michele@astute.ie. You may also opt out of receiving marketing communications at any time by selecting the unsubscribe option when you receive an electronic marketing communication from us. The withdrawal of your consent will not impact upon the lawfulness of processing based on your consent prior to the withdrawal.

Other Websites

Our website may contain links to other sites and any external links will be identifiable as such. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policy.

Changes to this Statement

Please review the website regularly as this statement may change from time to time.

Questions or Complaints

E: michele@astute.ie

We are committed to complying with the terms of the GDPR and to the processing of personal data in a fair, lawful and transparent manner. If, however, you believe that we have not complied with our obligations under the GDPR, you have the right to lodge a complaint with the Office of the Data Protection Commissioner.

Ends