

## **TRAVERSE ADVISORY LIMITED**

### **PRIVACY POLICY**

Traverse Advisory Limited is committed to implementing fair information practices that are designed to protect your privacy. This Privacy Policy explains how we collect and use personal information about you.

#### **Provision of professional services**

We need to know basic personal data in order to provide you with our services, and to claim our right to be paid in return for our services, under our standard terms of business we have with you. If you do not provide this information then we will be unable to provide the services you have requested. We will not collect any personal data from you that we do not need in order to provide and oversee the services we have agreed to provide you with. If you have a privacy query or concern, please contact our Data Protection Officer at [info@traverse-advisory.co.uk](mailto:info@traverse-advisory.co.uk)

#### **The information we collect**

You do not have to submit any personal information in order to visit or use our website [www.traverse-advisory.co.uk](http://www.traverse-advisory.co.uk) We may collect personally identifiable information that is voluntarily provided by visitors to our website. This information may include name, title, contact information including email address, and any other information provided by visitors in email messages or attachments thereto. It is Traverse Advisory Limited's policy to limit the information collected to only the minimum information required to complete a website visitor's request.

We use reasonable efforts to retain personal data collected from you only for so long as we need such data in accordance with the purpose for which it was collected, or until we are requested to delete it, if earlier.

Our intention is not to seek any sensitive information through our website. Sensitive information includes a number of types of data relating to race or ethnic origin, political opinions, religious or other similar beliefs, trade union membership, physical or mental health, sexual life, or criminal record.

#### **What we do with the information we collect**

Information obtained by the website is used for internal business purposes of Traverse Advisory Limited and in connection with a visitor's request. This data is not shared with others for unrelated purposes unless stated in this Privacy Policy or otherwise communicated to the website visitor. We require this information to provide you with the services you require, and may process data to

- deliver services and meet legal responsibilities;
- verify identity where this is required;
- communication by post, email or telephone;
- maintain records;
- prevent and detect crime, fraud or corruption.

All the personal data we hold about you will be processed by directors and staff of Traverse Advisory Limited and no third parties will have access to your personal data unless there is a legal obligation for us to provide them with this. We do not sell your personal data or provide it to third parties for their direct marketing use.

We make every practical effort to avoid excessive or irrelevant collection of data. If a visitor believes the website has collected excessive information, we encourage the visitor to contact us at [info@traverse-advisory.co.uk](mailto:info@traverse-advisory.co.uk) to raise any concerns.

Except for instances where visitors explicitly choose to receive specific Traverse Advisory Limited marketing or other informational materials, we will not use personal data collected from our website to distribute marketing or informational materials.

## **Information Security**

We have in place reasonable commercial standards of technology and operational security to protect all information provided by visitors via our website from unauthorised access, disclosure, alteration, or destruction.

We aim to ensure that access to your information data is limited to those directors and employees who need to access it. Those individuals are required to maintain the confidentiality of this information.

## **Use of cookies**

This site may collect standard internet log information, and may make use of cookies, which are small text files placed on your machine to retain user preferences etc to improve your browsing experience. Use of cookies may improve the quality of the website.

A visitor may choose to not receive a cookie file by enabling your web browser to refuse cookies. The procedure for refusal of cookies may vary for different software products. Please check with your internet browser software help or your software supplier if you wish to disable cookies in your browser.

## **Links to other websites**

There are several places throughout this website that may link to other websites over which we do not have any control. When visitors link to other websites, Traverse Advisory Limited's privacy practices no longer apply, and we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites. We encourage visitors to review each site's privacy policy before disclosing any personally identifiable information.

## **Controlling your personal information**

Each visitor has the right of access to personal data they have submitted through our website. If at any point you believe the information we process on you is incorrect you can request to see this information and have it corrected or deleted. If you wish to raise a complaint on how we have handled your personal data, you can contact our Data Protection Officer who will investigate the matter.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner's Office (ICO).

Your personal data will only be shared with third parties including other data controllers where it is necessary for the performance of the data controllers' tasks or where you first give us your prior consent,

Visitors are not required to register to gain access to our website. Personally identifiable information provided to Traverse Advisory Limited through our website is provided voluntarily by visitors. Should visitors subsequently choose to unsubscribe from mailing lists or any registrations, we will provide



instructions on the appropriate website area or in communications to our visitors, or a visitor may contact Traverse Advisory Limited at [info@traverse-advisory.co.uk](mailto:info@traverse-advisory.co.uk).

## **Your rights**

You have the right at any time to require us to stop using your personal information for direct marketing purposes. In addition, where we use your personal information to perform tasks carried out in the public interest then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

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 our use of your information. The right might also apply where this is no longer a basis for using your personal information but you don't want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

If we use your personal information on an automated basis to make decisions which significantly affect you, you have the right to ask that the decision be reviewed by an individual to whom you may make representations and contest the decision. This right only applies where we use your information with your consent or as part of a contractual relationship with you.

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 us at [info@traverse-advisory.co.uk](mailto:info@traverse-advisory.co.uk) if you wish to exercise any of these rights.

## **Complaints**

We seek to resolve directly all complaints about how we handle personal information but 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>

## **Consent**

By using our website [www.traverse-advisory.co.uk](http://www.traverse-advisory.co.uk) you are agreeing to the use of your information as described in our Privacy Policy, which sets out how Traverse Advisory Limited uses and protects any information that you provide when you use this website. Please do not send us any personal data if you do not want that information to be used by us in this manner.

## **Modification**

Traverse Advisory Limited reserves the right to modify or amend this Privacy Policy at any time. The effective date will be displayed at the end of this Policy. To keep visitors informed, Traverse Advisory Limited will notify users of material changes to our Privacy Policy by prominently identifying a link on our website home page to the updated Privacy Policy for a period of not less than two weeks.

This Privacy Policy was last reviewed in May 2018.