

Website Privacy Notice

1 INTRODUCTION

1.1 Our Contact Details

Our site (<https://sparkevidence.co.uk/about#home>) is owned and operated by Spark Evidence Ltd, a private limited company registered in England under company number 14774378, whose registered address is 13 Halland Road, Cheltenham, GL53 0DJ. Our ICO registration number is ZB619442.

This privacy policy describes how we will collect and use your personal data. Please read it carefully, and if you have any questions, please contact us at info@sparkevidence.co.uk.

1.2 What Data We Collect and How?

We currently collect and process the following information:

- **Profile/Identity Data:** first name, last name, title, job title
- **Contact Data:** phone number, postal addresses, email address(es).
- **Financial Data:** banking details e.g. your account number and sort code, details and records of all payments you have made for our services or products,
- **Quote Data:** details on quotes issued to you.
- **Technical Data:** we do not use cookies on Our website.
- **Communication Data:** details of communications between you and our team in relation to your enquiry or the project we are delivering for you.

2 HOW WE USE YOUR PERSONAL DATA

2.1 Our Data Uses

Most of the personal data we process is provided directly by you, and under the UK General Data Protection Regulation (UK GDPR), we must have a lawful basis for processing this information. The table below lists the processing purposes and the lawful basis.

Activity	Type of data	Legal Justification	Lawful basis for processing data
In the process of discussing new business	Profile/Identity Data Contact Data Quote Data Communications Data	Legitimate Interest	We need to process this data to communicate with our clients about proposals prior to the work being commissioned

When a customer contracts with us for a project	Profile/Identity Data Contact Data Financial Data Communications Data	Contractual Obligations Legal Compliance	We need to have a contract in place for each piece of work we perform that confirms our study obligations (including any external regulations to be adhered to), the client contact details and the invoicing procedures so that we can understand roles, responsibilities, and timelines for the project, and charge the client for the work.
As a project is delivered	Profile/Identity Data Contact Data Communication data	Contractual Obligations	As a service business, we will need to communicate with our clients regularly regarding ongoing projects.

2.2 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 explain how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your Personal Data for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

3 Who Do We Share Your Data With

3.1 Sharing your data with third parties

We may share your Personal Data with subcontractors or affiliates, subject to confidentiality obligations to use it only for the purposes we disclose it to them and pursuant to our instructions.

We may share your Personal Data at any time if required for legal reasons or to enforce our terms or this Privacy Notice.

4 International Data Transfers

4.1 Do We Transfer Your Personal Data Outside of the United Kingdom

We store some of your personal data in countries outside of the UK. These are known as “third countries”. We will only store or transfer personal data in or to countries deemed to provide adequate protection for personal data.

5 Data Security

5.1 How do we store your personal data?

We are concerned with keeping your data secure and protecting it from inappropriate disclosure. We implement a variety of security measures to ensure the security of your Personal Data on our systems, including:

- All our IT equipment is password protected.
- Our computers have an active firewall and anti-virus software installed.
- Two-factor authentication has been enforced on access to emails and shared drives.
- IT system is set to update automatically and is monitored by our third-party IT provider to ensure this happens. The software used is supported and not freeware.
- Our computers are encrypted, so if they are stolen, the data cannot be accessed. Any mobile devices connected to email must have a lock implemented.
- Any Personal Data collected by us is only accessible by a limited number of employees with special access rights to such systems and are bound by confidentiality obligations.
- When we use subcontractors to store your data, we will not relinquish control of your Personal Data or expose it to security risks that would not have arisen had the data remained in our possession. However, unfortunately no transmission of data over the internet is guaranteed to be completely secure. It may be possible for third parties not under the control of Spark Evidence Ltd to intercept or access transmissions or private communications unlawfully.
- Procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data), including notifying you and/or the Information Commissioner's Office where we are legally required.

While we strive to protect your Personal Data, we cannot ensure or warrant the security of any Personal Data you transmit. Any such transmission is done at your own risk. If you believe your interaction with us is no longer secure, please contact us.

6 **HOW LONG WE RETAIN YOUR DATA**

We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it and in line with the 'archive period' agreed within the client contract. We may retain your Personal Data for a longer period than usual in the event of a complaint or if we reasonably believe there is a prospect of litigation concerning our relationship with you. We will securely destroy your Personal Data when it is no longer required.

7 **YOUR RIGHTS**

7.1 **What Are Your Individual Rights**

Under data protection law, you have rights, including:

- **The Right of Access.** You have the right to ask us for copies of your personal information. An automated form is available on the SPARK Evidence website which will pass your request to the team to process. Typically this will take 30 days.
- **The Right to Rectification.** You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **The Right to be Forgotten.** You can ask us to erase your personal information in certain circumstances.
- **The Right to Restrict of Processing.** You have the right to ask us to restrict the processing of your personal data in certain circumstances.

- **The Right to Object.** You have the right to object to the processing of your personal data in certain circumstances.
- **The Right to Withdraw Consent.** If we rely on consent to process your personal data, you can withdraw that consent at any time.
- **The Right to Portability.** You have the right to ask that we transfer the personal data you gave us to another organisation or to you in certain circumstances.

You are not required to pay any charge to exercise your rights. If you make a request, we have one month to respond.

7.2 How to Complain

If you have any concerns about our use of your personal information, you can complain to us at info@sparkevidence.co.uk. You can also complain to the Information Commissioner's Office (ICO) if you are unhappy with how we have used your data. The ICO's address is the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Alternatively, you can phone their helpline at 0303 123 1113 or complete an online form via the ICO website (<https://www.ico.org.uk>).

8 NOTIFICATION OF CHANGES AND ACCEPTANCE OF POLICY

We keep our Privacy Notice under review and will place any updates here. This version is dated 12 September 2024.