

Management Consulting Group PLC Privacy Notice

Management Consulting Group PLC ("MCG, "we", "us", "our") is committed to protecting the privacy of those with whom we interact, and we recognise the need to respect and protect information that is collected or disclosed to us (called "Personal Information", explained below).

This Privacy Notice is intended to tell you how we use your personal information, and we have tried to explain what we do in enough detail to give you the information you need at a glance, with the option of following a link if you want to find out more. If you still cannot find the information you need, you can email us at contact_us@proudfoot.com.

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1. Who are we?

MCG is the data controller and is responsible for this website.

We have appointed an individual responsible for our data protection compliance, and for overseeing questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact us using the details set out below.

Contact details

Our full details are:	Management Consulting Group PLC
Name of individual:	Michael Shuber
Email address:	mshuber@mcgplc.com
Postal address:	Management Consulting Group PLC, St Paul's House 10 Warwick Lane London EC4M 7BP

2. What is Personal Information and what Personal Information does MCG collect about you?

For the purposes of this Privacy Notice "**Personal Information**" consists of any information that relates to you and/or information from which you can be identified, directly or indirectly. For example, information which identifies you may consist of your name, address, telephone number, photographs, location data, an online identifier (e.g. cookies identifiers and your IP address) or to one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity. When we combine other information (i.e. information that does not, on its own, identify you) with Personal Information, we treat the combined information as Personal Information.

We may collect use, store and transfer different kinds of Personal Information about you which we have grouped together as follows:

- **Personal Data** may include names, contact details, identification documentation, correspondence with you, financial details, payment history, pricing/budgeting and invoicing, company information, and details of services where identifiers are contained.
- **Technical Data** includes internet protocol (IP) address (IP addresses are a string of numbers assigned to a computer by an internet service provider).
- **User Behaviour / Engagement Data** includes the date and time of registration, usage session dates and duration, page views, features and functions used, preferences and settings selected, and location.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us [and our third parties] and your communication preferences.

3. How is your Personal Information collected?

MCG collects information through the website and through enquiries made via phone or in person. We use different methods to collect data from and about you including:

- I. Personal Information you provide directly.** You may give us the Personal Information set out above when you contact us.
- II. Automated technologies or interactions.** As you interact with our system, we may automatically collect Technical Data and User Behaviour/Engagement Data about your equipment, browsing actions and patterns. We collect this Personal Information by using cookies and other similar technologies. Please see section 9 below for further details.
- III. Third parties or publicly available sources.** We may receive personal data about you from various third parties [and public sources] as set out below:
 - Technical Data by using tracking and analytics tools, such as pixel tags, action tags, web beacons and JavaScript amongst others to collect and analyse information on behaviour and engagement with our Systems.
 - Identity and Contact Data from publicly available sources such as Companies House.
- IV** MCG is the parent company to Proudfoot. Proudfoot is a management consulting firm that specializes in operational and digital transformation.

We may collect the following information:

- Name and job title
- Contact information including email address
- Demographic information, such as postcode, preferences and interests
- Website usage data
- Other information relevant to client enquiries

Collecting this data helps us understand what you are looking for from the company, enabling us to deliver improved products and services.

Specifically, we may use data:

- For our own internal records
- To improve the services we provide
- To contact you in response to a specific enquiry
- To customise the website for you
- To send you promotional emails about services, offers and other items we think might be relevant to you.
- To send you promotional mailings or to call you about services, offers and other things we think might be relevant to you.
- To contact you via email, telephone or mail for market research reasons.

We have a legitimate interest in collecting your data. Proudfoot provides B2B services. We collect data to find businesses similar to those we already serve for marketing purposes. We therefore collect data that we will use to contact businesses our products and services would be of interest to. We define the term 'legitimate interest' according to the definition stated in the ICO: Guide to GDPR. 'Legitimate interest: the processing is necessary for your legitimate interests or the legitimate interests of a third party

unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.'

4. How do we use your information?

We may use the Personal Information we collect for the following purposes:

- I. **Provide our Services** – dealing with the provision of our business consultancy services, dealing with client administration and administering our website; Proudfoot gathers and uses certain information about individuals, in order to offer services that may be of interest to visitors to our website. This information is also used to enable certain functions on this website. We collect information to better understand how visitors use this website and to present timely, relevant information to them.
- II. **Analysis Purposes** – assessing and analysing our Services, and creating sales and marketing plans and programs;
- III. **Business Development** – to engage with other businesses (e.g. suppliers) to provide our Services to our clients and to develop business relationships;
- IV. **Customised Content** - to provide customised information to you;
- V. **Service Improvement** – to enhance our brand and to develop new services;
- VI. **Customer Support Services** - to provide customer support services, product training and education to users;
- VII. **Legal Obligations** - to comply with our legal obligations;
- VIII. **Updates** - to communicate with you, including communicating with you about your account, projects or transactions with us, giving you important information about other Services, sending you notices about any material changes to our Privacy Notice, and, where permitted by you and applicable laws, marketing, sending you offers and promotions for our Services.
- IX. **[Crime Prevention** - for the prevention or detection of fraud or crime;]
- X. **[Training** – for staff training and quality assurance purposes, particularly in relation to our customer support representatives;]

The law allows us to use the Personal Information as set out above on the basis that the processing is necessary for the performance of a contract with you, or we are acting in our "legitimate interests" (insofar as your fundamental rights and freedoms are not overridden) such as maintaining information within MCG.

Marketing Communications

MCG may use your Personal Information to provide you with email notifications and other communications by email, post, and/or telephone on the basis that such use is necessary for our legitimate interests, such as promoting our Services. For further information on this, see the 'Your Choices' section of this Privacy Notice.

Combining Personal Information

We may combine the Personal Information that we collect from you (including information received from our affiliates) to the extent permitted by applicable law.

5. To whom do we disclose your information?

We will only use your Personal Information for our internal business purposes, some of which are mentioned above. We do not sell any of your Personal Information to third parties. However, we may disclose your information to the following entities:

- I. Third parties (business purposes):**
We deal with third parties for the purposes of providing our Services to you.
- II. Service Providers**
We use third party service providers to help us to administer certain activities and services on our behalf. We may share Personal Information about you with such third party service providers solely for the purpose of enabling them to perform services on our behalf and they will operate only in accordance with our instructions. Service providers include email support services, analytics service providers.
- III. Third parties when required by Law or to Protect our Services**
We will disclose your Personal Information to comply with applicable law or respond to valid legal process, including from our regulators, law enforcement or other government agencies; to protect our customers (e.g. to prevent spam or attempts to defraud users of our Services); to operate and maintain the security of our Services (e.g. to prevent or stop an attack on our systems or networks); or to protect the rights or property of MCG, including enforcing any terms or agreements governing the use of our Services.
- IV. Other Parties At Your Direction**
We may share Personal Information about you with third parties when you request to such sharing, including your financial adviser, broker, actuary, solicitor, insurer, or accountant.
- V. Proudfoot**
We will always hold your information securely. To prevent unauthorised disclosure or access to your information, we have implemented strong physical and electronic security safeguards. We also follow stringent procedures to ensure we work with all personal data in-line with the General Data Protection Regulation.

Our website may contain links to other websites. Please note that we have no control of websites outside the Proudfoot domain. If you provide information to a website to which we link, we are not responsible for its protection and privacy. Always be wary when submitting data to websites. Read the site's data protection and privacy policies fully.

Our website platform provider, HubSpot, collects cookies for us. Find out more about how HubSpot collect cookies here: [What Cookies Are Used By HubSpot?](#)

Our website platform provider, HubSpot, may access your data while troubleshooting website issues for us.

6. What do we do to keep your information secure?

We have put in place appropriate physical and technical measures to safeguard the Personal Information we collect in connection with our Services. In addition, we limit access to your Personal Information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Information on our instructions and they are subject to a duty of confidentiality. However, please note that although we take appropriate steps to protect your Personal Information, no website, product, device, online application or transmission of data, computer system or wireless connection is completely secure and therefore we cannot guarantee the security of your Personal Information.

International Transfer of Data

The Personal Information that we collect from you will be stored and processed in Salesforce.

If we handle your data outside the EEA, we will take all steps reasonably necessary to ensure that your Personal Information is kept secure and treated in accordance with this Privacy Notice and the requirements of applicable law wherever the data is located. If we may transfer your Personal Information outside the EEA to other countries, we will ensure that appropriate transfer agreements and mechanisms (such as the EU Model Clauses) are in place to help ensure that our third-party service providers provide an adequate level of protection to your Personal Information. We would only transfer your Personal Information outside the EEA in accordance with applicable laws or where you have given us your consent to do so.

7. Data Retention – How long we will store/keep your Personal Information

MCG retains Personal Information for as long as necessary to fulfil the purposes for which your Personal Information has been collected as outlined in this Privacy Notice unless a longer retention period is required by law. When your Personal Information is no longer required for the purpose it was collected or as required by applicable law, it will be deleted and/or returned to you in accordance with applicable law.

8. Accessing your Personal Information and other rights you have

MCG will collect, store and process your Personal Information in accordance with your rights under any applicable data protection laws. Under certain circumstances, you have the following rights in relation to your Personal Information:

- I. **Subject Access** - you have the right to request details of the Personal Information which we hold about you and copies of such Personal Information.
- II. **Right to Withdraw Consent** – where you have consented to our processing of your Personal Information, you have the right to withdraw such consent at any time. In the event you wish to withdraw your consent to processing, please contact us using the details provided in section **Error! Reference source not found.**
- III. **Data Portability** – you may, in certain circumstances, request us to port (i.e. transmit) your Personal Information directly to another organisation.
- IV. **Rectification** – we want to ensure that the Personal Information about you that we hold is accurate and up to date. If you think that any information we have about you is incorrect or incomplete, please let us know. To the extent required by applicable laws, we will rectify or update any incorrect or inaccurate Personal Information about you.
- V. **Erasure ('right to be forgotten')** - you have the right to have your Personal Information 'erased' in certain specified situations.
- VI. **Restriction of processing** – you have the right in certain specified situations to require us to stop processing your Personal Information and to only store such Personal Information.
- VII. **Object to processing** – you have the right to object to specific types of processing of your Personal Information, such as, where we are processing your Personal Information for the purposes of direct marketing.
- VIII. **Prevent automated decision-taking** – in certain circumstances, you have the right not to be subject to decisions being taken solely on the basis of automated processing.

Enforcing your rights

If you wish to enforce any of your rights under applicable data protection laws, then please contact us at info@proudfoot.com. We will respond to your request no later than one month from receipt of any such request, unless a longer period is permitted by applicable data protection laws, and we may charge a reasonable fee for dealing with your request which we will notify to you. Please note that we will only charge a fee where we are permitted to do so by applicable data protection laws.

Complaints

If you are concerned that we have not complied with your legal rights under applicable data protection laws, you may contact the Information Commissioner's Office (www.ico.gov.uk) which is the data protection regulator in the UK which is where MCG is located. Alternatively, if you are based outside the UK, you may contact your local data protection supervisory authority.

9. Third party links on our Services

Our systems may contain links to other third-party websites that are not operated by MCG, and our websites may contain applications that you can download from third parties. These linked sites and applications are not under MCG's control and as such, we are not responsible for the privacy practices or the content of any linked websites and online applications. If you choose to use any third-party websites or applications, any Personal Information collected by the third party's website or application will be controlled by the privacy notice of that third party. We strongly recommend that you take the time to review the privacy policies of any third parties to which you provide Personal Information.

10. Cookies

What are cookies?

MCG may use cookies and other technologies, including web beacons, action tags, pixel tags, in certain areas of our Services. Cookies are small text files that can be read by a web server in the domain that put the cookie on your hard drive. Cookies are assigned to and stored in a user's internet browser on a temporary (for the duration of the online session only) or persistent basis (cookie stays on the computer after the internet browser or device has been closed). Cookies collect and store information about a user's preferences, product usage, content viewed, and registration information which allows for MCG to provide users an enhanced and customised experience when engaging with our systems. We may use cookies to store your preferences and settings, help you with signing in, provide targeted ads, and analyse site operations.

11. Your Choices (e.g. marketing related emails or otherwise)

We may use your Personal Information (such as your contact details (e.g. name, address, email address, telephone number)) to send you marketing-related correspondence by email, telephone, and/or post related to our systems in accordance with your contact preferences or as you otherwise agree to. When we process your Personal Information for marketing purposes, we do so on the basis that it is in our legitimate interests to do so, for example, to promote MCG.

[We do not share Personal Information with third parties for the third parties' marketing purposes.]

We may also use your Personal Information to personalise and to target more effectively our marketing communications to ensure, to the extent possible, that any marketing-related correspondence is relevant to you.

To opt out of receiving marketing-related correspondence from MCG, please contact us or click "Unsubscribe" from any marketing or promotional email [or text message (SMS)] you receive from us.

12. Changes to this Privacy Notice

It is also important that you check back often for updates to the Privacy Notice, as we may change this Privacy Notice from time to time. The "Date last updated" legend at the bottom of this page states when the Privacy Notice was last updated, and any changes will become effective upon our posting of the revised Privacy Notice.

We will provide notice to you if these changes are material and, where required by applicable law, we will obtain your consent. We will provide this notice by email or by posting notice of the changes on our website or through any relevant Services.

13. Contact Us / Further Information

If you have any questions regarding the collection, processing, or use of your Personal Information or if you wish to correct, block, rectify, object, access, revoke your consent to any applicable aspect of this Privacy Notice or delete any of your Personal Information, please contact us on our details above.

Date last updated: May 2018