

## Privacy Policy

Euro Group is committed to complying with its legal obligations under the General Data Protection Regulation 2018 (“GDPR”) and to the protection of the rights and freedoms of individuals whose personal data Euro Group obtains or generates as part of its business operations.

In this policy “we”, “us” and “our” means the Euro Group is responsible for any personal information collected about you.

### What Does This Policy Cover?

This Privacy Policy applies only to your use of our site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

### Your rights as a data subject

As a data subject you have certain rights which you may exercise if we are in possession of, or are processing, your personal data. Specifically:

- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – you have a right, in certain circumstances, to ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** – where certain conditions apply you have a right to restrict the processing of your personal data.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.

### What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

If you visit our website ( [www.epgroup.co.uk](http://www.epgroup.co.uk) ) your personal data including your name, email address, telephone number and other contact information will be collected if you fill out the contact us page.

We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

### **What Personal Data Do You Collect and How?**

Subject to the following, we do not collect any personal data from you. We do not place cookies on your computer or device, nor do we use any other means of data collection.

If you send us an email, we may collect your name, your email address, and any other information which you choose to give us. For the purposes of the Data Protection Legislation, we the data controller responsible for such personal data.

The lawful basis under the Data Protection Legislation that allows us to use such information is article 6(1)(f) of the GDPR which allows us to process personal data when it is necessary for the purposes of our legitimate interests, in this case, the proper operation and functionality our Site. If you contact us as described above, you will be required to consent to our use of your personal data to contact you. In this case, our lawful basis for using your personal data will be article 6(1)(a) of the GDPR, which allows us to use your personal data with your consent for a particular purpose or purposes.

### **How Do You Use My Personal Data?**

Where we collect any personal data, it will be processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the Data Protection Legislation at all times.

As stated above, we do not generally collect any personal data directly from you, but if you contact us and we obtain your personal details from your email, we may use them to respond to your email. The other technical data referred to above is necessary for the technical operation of our Site and will not normally be used in any way to personally identify you.

Any and all emails containing your personal data will be deleted no later than 6 months after the subject matter of your email has been resolved, and no other personal data will be retained for any longer than is necessary.

We will not share any of your personal data with any third parties for any purposes.

### **How and Where Do You Store My Data?**

We will only store your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

### **Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to the following exception.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way that we have used it, as specified in this Privacy Policy (i.e. to communicate with you).

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within less than one month and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## **Contact Information**

Our Data Protection Officer is responsible for the management of personal data within Euro Group and for ensuring that compliance with data protection legislation and good practice can be demonstrated. Questions, comments and requests regarding this Privacy Notice or our collection or use of personal data should be addressed to:

### **The Data Protection Officer**

Euro Group  
20 Brickfield Road, Yardley  
Birmingham  
B25 8HE

Email address: [dpo@eurogrp.co](mailto:dpo@eurogrp.co)

Telephone number: 0121 706 6181

## **Changes to this Privacy Policy**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our Site following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on August 2019.