

## PRIVACY NOTICE

This **Privacy Notice** is issued jointly by Tapestry Compliance Limited and Tapestry Insight Limited (both registered at 5&6 Sellers Wheel, 151 Arundel Street, Sheffield, S1 2NU, United Kingdom) ("**Tapestry**").

We understand that your data privacy is important. In the course of running our business and providing services to you, we will process your personal data in accordance with the European General Data Protection Regulation ("**GDPR**") and other applicable data protection laws.

This Privacy Notice covers how we may use, process and store your personal data. This Privacy Notice may change from time to time - we recommend you review our Privacy Notice periodically.

### **How do Tapestry obtain personal data?**

We want to offer you the best possible service. We may obtain your personal data during the course of running our business. Without your personal data, it may not be possible for us to provide services to you.

### **What data is collected?**

In the course of running our business the "personal data" we process includes but is not limited to: your name, address, telephone number and email address.

### **Who is controlling your data?**

Tapestry is the "data controller" of your personal data, as we determine why and how your personal data is processed during the course of our business.

### **What is the purpose and basis for processing?**

Your personal data may be processed for a variety of purposes in the course of running our business and offering our services to you.

We will always process personal data in an appropriate and lawful manner in line with relevant data protection principles. As our business operates globally, different laws may apply depending on where you are based.

### ***Processing governed by the GDPR:***

If you are located in the European Economic Area ("**EEA**") the processing of your data is primarily governed by EU laws, specifically the GDPR. The basis on which we process your personal data is the pursuance of our "legitimate interests". These legitimate interests may include:

- to provide legal and tax advice;
- to provide training;
- and to deliver our latest newsletters and marketing materials.

We will always consider your interests, rights and freedoms when processing data as required by relevant law.

### ***Processing governed by GDPR and international laws:***

If you are located outside of the EEA, the processing of your data may be governed by local, national and/or other international laws as well as GDPR. Where laws, other than GDPR, require consent for processing data, we will assume that you consent to us processing your data in accordance with this Privacy Notice, unless you opt out.

### **Transferring your data**

In the course of providing our services your personal data may be transferred to countries outside of the EEA - for example we may cc you on an email sent out of the EU.

If we hold any of your personal data which relates to an incentive award (which is unlikely) we may pass it to third parties including trustees, registrars, brokers, administrators, regulators and external advisors, who may also have a legitimate interest.

Anyone processing your personal information is required to comply with global data protection laws.

We will not pass your data to anyone for marketing purposes. We will only pass your data to third parties if required to do so by law or if necessary as part of our provision of services to you or your employer.

### **How long will we keep your data?**

We will keep your data no longer than is necessary. If your data is no longer required it will be destroyed. Some of the factors which will affect how long we retain your data include your continued engagement with Tapestry, your status as an Alumni of the ICSA Course, and your continued receipt of our newsletters and marketing materials.

### **Your rights**

You have a number of rights relating to your personal data and our processing of this data. In most circumstances you can request access to and correction of your personal data (and you can also request the erasure of personal data and/or object to the processing of your personal data and request a restriction, though this may impact our provisions of services to you).

### **Questions and who to contact**

If you have any questions, complaints or concerns regarding how we handle your personal data, you can contact our Data Privacy Manager, Bob Grayson ([bob.grayson@tapestrycompliance.com](mailto:bob.grayson@tapestrycompliance.com)).

If you are not satisfied with our response or believe our processing of your personal data is in breach of any applicable laws, you can complain to your local supervisory authority.