

Website Privacy Policy

Key Details

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| Policy became operational on: | 16 July 2018 |
| Next Review date: | 16 July 2019 |
| Version: | v1.1 |

Who we are

Steer, headquartered in London, operates and provides this website, and controls the collection and processing of personal data you provide to us in relation to this website. We comply with the European General Data Protection Regulation (GDPR) and the local laws applicable in the various countries in which our Group Companies operate.

Steer Davies & Gleave Limited, a company registered in England under number 1883830 (“we”, “us” “our”). Registered Office: 28-32 Upper Ground, London, SE1 9PD. Telephone number: 020 7910 5000. [Click here](#) for details of our Group Companies.

We, and our Group Companies, are committed to respecting your privacy.

This Policy will inform you as to how we look after your personal data when you visit our website, our offices, or otherwise communicate with us (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

How to contact us

If you have any questions regarding your personal data and how we may use it, including any queries in relation to this Policy, including any requests to exercise your legal rights, please contact our Data Privacy Manager at Privacy@steergroup.com

Policy Important information

Purpose of this Policy

This Policy aims to give you information on how we collect and process your personal data, including any data you may provide through this website when you sign up to our email newsletter, download a copy of our 'Review' magazine or when we provide you with information you request.

If you are applying for a job through our website then please refer to our **Candidate Policy**.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this Policy together with any other policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Policy supplements the other notices and is not intended to override them.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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

- **Identity Data** includes first name, last name, job title and company, as well as photograph, video or audio content of you.
- **Contact Data** includes email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website.
- **Marketing and Communications Data** includes your preferences in receiving marketing communications from us and related information such as feedback and survey responses
- **Billing and Financial Data** includes information such as billing address, bank account and payment information

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For

example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Policy.

How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email, instant messenger, in person or otherwise. This includes personal data you provide when you:
 - contact us about our services
 - subscribe to our email communications
 - download our ‘Review’ magazine
 - attend our events
 - visit one of our buildings
- **Skype Meetings:** If we speak to you via Skype meeting (whether audio or video) such conversations may be recorded and, in which instances, we will store your personal data that may be recorded as part of that Skype meeting. This will be retained by us as communications data, in accordance with this Policy.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our [Cookies Policy](#) for further details.
- **CCTV:** We may also collect personal data from you from use of CCTV which may be in operation at our offices, or those offices where we provide our services. Any personal data collected from use of CCTV will be used by us for the purpose of ensuring the safety and security of our staff or those people coming onto our premises, or premises where we provide our services. Such CCTV will be retained for so long as is necessary to ensure that there are no issues relating to safety and security that need to be addressed and then only for so long as needed to deal with such issues. If there are no issues to address, then such footage shall be kept for no longer than reasonably necessary.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:
 Technical Data from the following parties:
 - a. analytics providers such as Google Analytics based outside the EU;
 - b. advertising networks such as Google AdWords based outside the EU; and
 - c. search information providers such as Google, Bing and Yahoo based outside the EU.

How we use your personal data

We will only use your personal data when the law allows us to. For example, we will use your personal data if we have your consent or another legally permitted reason applies. These

include to fulfil a contract with you, when we have a legal duty to comply with, or when it is in our legitimate business interest to use your personal data (this will only be the case where it is fair and reasonable to do so). *Please also refer to Appendix A – “How we use your personal data” Table*

Purposes for which we will use your personal data

[Click here](#) for a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out.

Marketing

You will receive marketing communications from us if you provided us with your details to receive marketing communications from us, you have purchased services from us or we have a relationship with you in relation to our services, and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will never share your personal data with any company outside of our Group Companies for marketing purposes.

Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by [contacting us](#) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase or job application.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookies Policy](#).

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 get an explanation as to 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 we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may have to share your personal data with the parties set out below.

- Other companies in the Steer Group acting as joint controllers or processors and who are based in Canada, Chile and USA and provide data administration services.
- Third party service providers who provide data processing to help us deliver programmes, products, information, and services, such as, without limitation, document processing and confidential waste disposal, IT systems or software providers, IT Support service providers, document and information storage providers. Service providers are also an important means by which we the Group maintains its website and mailing lists.

We conduct an appropriate level of due diligence and put in place contractual documentation in relation to any sub-contractor to ensure that they process personal information appropriately and according to our legal and regulatory obligations.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers

We share your personal data within our Group Companies. This will involve transferring your data outside the European Economic Area (EEA).

Whenever we transfer your personal data out of the EEA within our Group Companies, we ensure a similar degree of protection is afforded to it by using specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see **European Commission: Model contracts for the transfer of personal data to third countries.**

Separate to the above, we may also transfer your personal data to countries outside the EEA to other people or companies for one of the legal bases for processing your personal data as indicated above. Where we do so, we will take all steps to ensure that for any country to which the personal data has been transferred has suitable protection mechanisms in place to protect personal data in any contract with that third party for steps to be taken to keep personal data secure.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data Retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available by **contacting us**.

Your Legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data, including to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Your right to lodge a complaint with the supervisory authority

If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the relevant Supervisory Authority.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

COUNTRY SPECIFIC FURTHER INFORMATION

MEXICO

Steer Mexico will use information submitted through this website for the purposes of providing and administering marketing communications. The provision of personal data is voluntary. You have right to access, correct, cancel or oppose such data transfer as established under the terms of applicable Mexican Law, by sending a communication as provided above to privacy@steergroup.com, or to Steer Mexico either by email to: Leticia Carrillo Chagolla (Leticia.CarrilloChagolla@steergroup.com) or by calling +525591564304.

CHILE

Steer Chile has a registered address at Holanda 100, Oficina 504, Providencia, Santiago, Chile. When visiting our website, you are not required to provide any personal information unless you decide to fill-in and send us a contact form. In such case, and when applicable, we will differentiate between personal and non-personal data and retain that information in order to process your inquiries or requests.

Additionally, you may decide to communicate with us when you apply for a job through our Careers sections where with the aim of being able to contact you back, you will be prompted to enter your name and email address and accept the terms of our website disclaimer. Unless otherwise required by law, Steer Chile will not share your personal information with third parties. Your data will be used exclusively to communicate with you.

APPENDIX A

HOW WE USE YOUR PERSONAL DATA

| Uses of personal data | Our lawful basis for the use of your personal data |
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| To provide news and information services including email briefings and newsletters; to give access to online tools and to invite you to events that we and our partners organise. | Where you have consented and expressed a preference to receive such marketing communications; or where it is appropriate and relevant to our business relationship with you. |
| To send you details of surveys, campaigns or other initiatives that we co-ordinate. | Where you have consented and expressed a preference to receive such marketing communications; or where it is appropriate and relevant to our business relationship with you. |
| To operate suppression lists to ensure that you do not receive communications if you object or unsubscribe | To respect your rights and comply with our legal obligations. |
| To collect insights into how you interact with our services so that we can personalise our communications with you and improve our websites and services. | Where we have your consent or where it is necessary so that we can deliver our websites and online services effectively. |
| To provide transportation consultancy and related relevant services, to manage and administer our business relationships, including to communicate with our clients, their employees and representatives, to manage billing and payments and to keep records. | To fulfil our contract with our client(s) and to comply with legal and regulatory obligations including accounting, tax and data privacy. |
| To maintain security and manage access to our offices, systems and our websites. | To comply with legal obligations, and because we have a legitimate interest in maintaining the security of our buildings, websites and networks. |
| Enforcing our terms of engagement, website terms of use and other terms and conditions | To protect our legal interests. |
| Sharing personal data in connection with acquisitions and transfers of our business | To comply with legal obligations and to facilitate the transaction. |
| To manage our supply chain including identifying and maintaining contact with service providers. | Where necessary for the efficient running of our business. |
| Other purposes that we have identified at the point of collection. | Where we have your consent. |