

# Website Privacy Policy

This website is operated and provided by Steer Davies & Gleave Limited, trading as Steer. Steer respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Please use the [Glossary](#) to understand the meaning of some of the terms used in this privacy notice.

## Important information and who we are

### Purpose of this privacy notice

- 1.1 This privacy notice aims to give you information on how Steer collects and processes your personal data through your use of this website, 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 to provide you with information you request.
- 1.2 If you are applying for a job through our website then please refer to our [Candidate Privacy Notice](#).
- 1.3 This website is not intended for children and we do not knowingly collect data relating to children.
- 1.4 It is important that you read this privacy notice together with any other privacy notice 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 privacy notice supplements the other notices and is not intended to override them.

### Controller

- 1.5 Steer Davies & Gleave Limited is the controller and responsible for your personal data (collectively referred to as "Steer", "we", "us" or "our" in this privacy notice).
- 1.6 We have appointed a data privacy manager who is responsible 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 the data privacy manager using the details set out below.

### Contact details

*Our full details are:*

*Full name of legal entity: Steer Davies & Gleave Limited*

*Data Privacy Manager*

*[Privacy@steergroup.com](mailto:Privacy@steergroup.com)*

*Postal address: 28-32 Upper Ground, London, SE1 9PD*

*Telephone number: 020 7910 5000*

- 1.7 You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## Changes to the privacy notice and your duty to inform us of changes

- 1.8 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

- 1.9 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 notice of every website you visit.

## The data we collect about you

- 1.10 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).
- 1.11 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.
  - **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.
- 1.12 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 privacy notice.

## How is your personal data collected?

- 1.13 We use different methods to collect data from and about you including through:
- **Direct interactions.** You may give us your Identity and Contact by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
    - contact us about our services;
    - subscribe to our email communications; or
    - download our 'Review' magazine.
  - **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 cookie policy for further details.

- **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

- 1.14 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:
- Where we need to perform the contract, we are about to enter into or have entered into with you.
  - Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.
- 1.15 [View our glossary](#) to find out more about the types of lawful basis that we will rely on to process your personal data.
- 1.16 Generally, we do not rely on consent as a legal basis for processing your personal data. However, you have the right to withdraw consent to marketing at any time by [contacting us](#).

### Purposes for which we will use your personal data

- 1.17 We have set out below, in a table format, 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. We have also identified what our legitimate interests are where appropriate.
- 1.18 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 in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To manage our relationship with you which will include: Notifying you about changes to our terms or privacy policy To process any queries or requests you submit through the contact form on the website To process your request to receive marketing communications from us	Identity Contact Marketing and Communications	Necessary for our legitimate interests (to manage our relationship with you)
To use data analytics to improve our website, services, marketing, customer relationships and experiences	Technical Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

### Marketing

- 1.19 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

- 1.20 We will never share your personal data with any company outside of Steer Davies Gleave for marketing purposes.

### Opting out

- 1.21 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.
- 1.22 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

- 1.23 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 [Cookie Policy](#).

### Change of purpose

- 1.24 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](#).

1.25 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.

1.26 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

1.27 We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

1.28 Internal Third Parties as 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.

1.29 External Third Parties as set out below:

- Salesforce, based in USA who provide data administration services.

1.30 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

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

1.32 Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring that the following safeguard is implemented:

- Where we transfer personal data in our Group of Companies or where we use certain services providers, we may use 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](#).

1.33 Please **contact us** if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

### Data Security

1.34 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.

1.35 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?

- 1.36 We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for.
- 1.37 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.
- 1.38 Details of retention periods for different aspects of your personal data are available in our records retention policy which you can request from us by [contacting us](#).

## Your Legal rights

- 1.39 Under certain circumstances, you have rights under data protection laws in relation to your personal data. You can find out more about these rights [below](#).
- Request access to your personal data.
  - Request correction of your personal data.
  - Request erasure of your personal data.
  - Object to processing of your personal data.
  - Request restriction of processing your personal data.
  - Request transfer of your personal data.
  - Right to withdraw consent.
- 1.40 If you wish to exercise any of the rights set out above, please [contact us](#).

### No fee usually required

- 1.41 You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### What we may need from you

- 1.42 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

- 1.43 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.

## Glossary

### *Lawful basis*

- 1.44 **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).
- 1.45 **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- 1.46 **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### **Third parties**

#### *Internal third parties*

- 1.47 Other companies in the Steer Davies Gleave Group acting as joint controllers or processors and who are based in Canada, Chile and USA and provide data administration services.

#### *External third parties*

- 1.48 Salesforce, based in USA who provide data administration services.

### **Your legal rights**

- 1.49 You have the right to:
- 1.50 **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.
- 1.51 **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.
- 1.52 **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.
- 1.53 **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.

- 1.54 **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.
- 1.55 **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.
- 1.56 **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.



## APPENDIX A

## HOW WE USE YOUR PERSONAL DATA

Uses of personal data	Our lawful basis for the use of your personal data
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.