



Clucas Method of Entry Ltd



Clucas Training Wing Ltd

Privacy notice

Privacy Notice

This is the privacy notice of Clucas Method of Entry Ltd and Clucas Training Wing Ltd. In this document, "we", "our", or "us" refer to Clucas Method of Entry Ltd and Clucas Training Wing Ltd.

We are company number 01166522 and 06258353 registered in the United Kingdom

Our registered offices are at Sandiacre, Dunswell Road, Cottingham, East Yorkshire, HU16 4JT.

Our Data Protection Officer is Elaine Clucas.

Introduction

1. This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.
2. We regret that if there are one or more points below with which you are not happy, your only recourse is to leave our website immediately.
3. We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our organisation are entitled to know that their personal data will not be used for any purpose unintended by them and will not accidentally fall into the hands of a third party.
4. We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.
5. Our policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).
6. The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data. We do this now, by requesting that you read the information provided at [knowyourprivacyrights.org/](https://www.knowyourprivacyrights.org/)
7. Except as set out below, we do not share, or sell, or disclose to a third party, any information collected.

The bases on which we process information about you

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant, then we shall immediately stop processing your data.

If the basis changes then if required by law, we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

1. Information we process because we have a contractual obligation with you

When you create an account with us, buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- 1.1. verify your identity for security purposes
- 1.2. sell products to you
- 1.3. provide you with our services
- 1.4. provide you with suggestions and advice on products, services.
- 1.5. We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to a particular service we provide. If we use it for this purpose, you as an individual will not be personally identifiable.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

2. Information we process with your consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you ask us to provide you more information about our business, including job opportunities and our products and services, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information.

Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular service.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent, or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us at email address meoinfo@clucas.com. However, if you do so, you may not be able to use our services further.

3. Information we process because we have a legal obligation

We are subject to the law like everyone else. Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal information.

Specific uses of information you provide to us

4. Complaints regarding content on our website

Our website is a non-editable brochure website.

If you complain about any of the content on our website, we shall investigate your complaint.

If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

Free speech is a fundamental right, so we have to make a judgment as to whose right will be obstructed: yours, or that of the person who posted the content that offends you.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

5. Information relating to your method of payment

We do not store information about your debit or credit card or other means of payment.

6. Job application and employment

If you send us information in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. (Equality information is kept solely for monitoring purposes to ensure that our policies and procedures are effective) After your employment has ended, we will keep your file for six years before destroying or deleting it.

7. Sending a message to our support team

When you contact us, whether by telephone or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our organisation.

We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

8. Complaining

When we receive a complaint, we record all the information you have given to us.

We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

9. Affiliate and business partner information

This is information given to us by you in your capacity as an affiliate of us or as a business partner.

It allows us to recognise visitors that you have referred to us, and to credit to you commission due for such referrals. It also includes information that allows us to transfer commission to you.

The information is not used for any other purpose.

We undertake to preserve the confidentiality of the information and of the terms of our relationship.

We expect any affiliate or partner to agree to reciprocate this policy.

10. Personal Identifiers from your browsing activity

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

Disclosure and sharing of your information

11. Information we obtain from third parties

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

12. Credit Reference

To assist in combating fraud, we share information with credit reference agencies, so far as it relates to clients or customers who instruct their credit card issuer to cancel payment to us without having first provided an acceptable reason to us and given us the opportunity to refund their money.

13. Data may be processed outside the European Union

Our website is hosted in United Kingdom, we store data in the US and Ireland using proprietary cloud data hosting services e.g. Dropbox.

We may also use outsourced services in countries outside the European Union from time to time in other aspects of our business.

Accordingly, data obtained within the UK or any other country could be stored or processed outside the European Union.

We use the following safeguards with respect to data transferred outside the European Union:

- 13.1. the data protection clauses in our contracts with data processors include transfer clauses written by or approved by a supervisory authority in the European Union
- 13.2. we comply with a code of conduct approved by a supervisory authority in the European Union.
- 13.3. both our organisation and the processor are public authorities between whom there is either a legally binding agreement or administrative arrangements approved by a supervisory authority in the European Union relating to protection of your information

Access to your own information

14. Access to your personal information

- 14.1. At any time, you may review or update personally identifiable information that we hold about you, by emailing us at moeinfo@clucas.com
- 14.2. To obtain a copy of any information that is not provided on our website you may send us a request at moeinfo@clucas.com
- 14.3. After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

15. Removal of your information

If you wish us to remove personally identifiable information from our website, you may contact us at moeinfo@clucas.com

This may limit the service we can provide to you.

16. Verification of your information

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before

granting you access or otherwise taking any action. This is important to safeguard your information.

Other matters

17. How you can complain

- 17.1. If you are not happy with our privacy policy or if you have any complaint, then you should tell us by email. Our address is moeinfo@clucas.com
- 17.2. If a dispute is not settled, then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.
- 17.3. If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at ico.org.uk/concerns/

18. Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- 18.1. to provide you with the services you have requested;
- 18.2. to comply with other law, including for the period demanded by our tax authorities;
- 18.3. to support a claim or defence in court.

19. Compliance with the law

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

However, ultimately it is your choice as to whether you wish to use our website.

20. Review of this privacy policy

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website.

If you have any question regarding our privacy policy, please contact us.