

Privacy Policy

Your data is our highest priority

At THBA Ltd, we take your privacy seriously. We will never sell your data to third parties. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website or use our service.

Introduction

THBA Ltd (referred to as "We, "Our" or "Us"), is committed to protecting the privacy and security of your personal information. We take care to protect the privacy of our customers and users of our products that communicate with us, online or offline, in our offices, at events, over the phone, through our mobile applications, websites and social media platforms. We promise to never sell your data to third parties for marketing or other purposes.

We have therefore developed this Privacy Notice to inform you of the data we collect, what we do with your information, what we do to keep it secure, as well as the rights and choices you have over your personal information.

Throughout this document we refer to Data Protection Legislation which means the Data Protection Act 2018 (DPA2018), United Kingdom General Data Protection Regulation (UK GDPR), the Privacy and Electronic Communications (EC Directive) Regulations 2003, all the foregoing as amended from time to time, and any legislation implemented in connection with the aforementioned legislation. Where data is processed by a controller or processor established in the European Union or comprises the data of people of the European Union, it also includes the EU General Data Protection Regulation (EU GDPR). This includes any replacement legislation coming into effect from time to time.

THBA Ltd is the controller for the personal information we process, unless otherwise stated.

We are registered with the Information Commissioner's Office (the ICO) with registration number ZB805671

You can contact us either by phone, email or post.

Our company registered address: THBA Ltd, 31 Derek Avenue, Epsom, KT19 9HP, UK

Phone: +44 (0) 333 360 6915

Email: data@thba.co.uk

Our Data Protection Manager is Amandeep Sandhawalia who can be reached using the above contact details.

The Information We May Collect

We only collect personal information that we know we will genuinely use and in accordance with the Data Protection Legislation. Most of the details are required for our legal Anti-Money Laundering Obligations. The type of personal information that we will collect about you, and you voluntarily provide to us on our websites, mobile phone apps, emails, by phone, or any other means, may include some or all of the following:

- Names
- Addresses
- Date of Birth
- Place of Birth
- Nationality
- Telephone numbers
- Email addresses
- Employee/payroll numbers
- Employer name
- National Insurance Numbers
- Salaries
- Pension membership details
- Bank account details
- Credit card numbers
- Tax reference numbers
- Passport numbers
- Driving licence numbers
- Marital Status
- IP Addresses
- Survey responses
- Services used
- Subscriptions
- Records of conversations
- Agreements
- Payment transactions
- Cookies

How We Use Your Information

To contact you, following your enquiry, reply to any questions, suggestions, issues or complaints you have contacted us about

Make available our services to you

If the law or a public authority says we must share the personal data

If we need to share personal data in order to establish, exercise or defend our legal rights (this includes providing personal data to others for the purposes of preventing fraud and reducing credit risk)

We will never share your information with any third parties for the purposes of direct marketing.

We will never sell your information to third parties.

We use data processors who are third parties to provide elements of services for us. We have Data Processing Agreements in place with our data processors. This means that they are only able to process your personal information under our strict instructions. They may only share your personal information with other organisations apart from us if we have provided them with prior written consent for this sharing. In addition, these other organisations must comply with our Data Processing Agreement. They will hold your personal data securely and retain it for the period we instruct.

How We Keep You Updated On Our Services and Relevant Legislative Updates

We may send you relevant offers and news about our services, and relevant legislative updates in a number of ways including by email, but only if you have previously consented to receive these marketing communications. When you register with us, we will ask if you would like to receive marketing communications, and you can change your marketing choices online, by email or in writing at any time.

If you wish to amend your marketing preferences, you can do so by emailing data@thba.co.uk.

Your Rights Over Your Information

The right to be informed about our collection and use of personal data

You have the right to be informed about the collection and use of your personal data. We ensure we do this by providing you with this Privacy Notice. This Notice is regularly reviewed and updated to ensure it accurately reflects our data processing activities.

Right to Access Your Personal Information

You have the right to access the personal information that we hold about you in many circumstances, by making a request. This is sometimes termed a 'Data Subject Access Request'. If we agree that we are obliged to provide personal information to you (or someone else on your behalf), we will provide it to you or them free of charge and we will respond without delay and within one calendar month of receipt of your request. We may ask for proof of identity and sufficient information about your interactions with us so that we can locate your personal

information. Please note that the time limit for fulfilling your request does not start until we have been able to verify your identity. If you would like to exercise this right, please contact us as set out below.

Right to rectification of Your Personal Information

If any of the personal information we hold about you is inaccurate, incomplete or out of date, you may ask us to correct it. If you would like to exercise this right, please contact us as set out below.

Right to Stop or Limit Our Processing of Your Data

You have the right to object to us processing your personal information for particular purposes, to have your information deleted if we are keeping it too long, or have its processing restricted in certain circumstances. If you would like to exercise this right, please contact us as set out below.

Right to Erasure

You have the right to have personal data erased. This is also known as the 'right to be forgotten'. The right is not absolute and only applies in certain circumstances. If you would like to exercise this right, please contact us as set out below.

Right to data Portability

The right to data portability gives you the right to receive personal data you have provided to a controller in a structured, commonly used and machine readable format. It also gives them you the right to request that a controller transmits this data directly to another controller. If you would like to exercise this right, please contact us as set out below.

For more information about your privacy rights

The Information Commissioner's Office (ICO) regulates data protection and privacy matters in the UK. They make a lot of information accessible to consumers on their website and they ensure that the registered details of all data controllers such as ourselves are available publicly. You can access them here <https://ico.org.uk/for-the-public>. You can make a complaint to the ICO at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first. Your satisfaction is extremely important to us, and we will always do our very best to solve any problems you may have.

How Long We Keep Your Information For

We retain a record of your personal information in order to provide you with a high quality and consistent service. We will always retain your personal information in accordance with the Data Protection Legislation and never retain your information for longer than is necessary. If you sign an agreement with us and use any of our services, unless otherwise required by law, your data will be stored for a period of 6 years after our last contact with you or disengagement, at which point it will

be deleted. Otherwise, unless otherwise required by law, your data will be stored for a period of 3 years after our last contact with you.

Giving Your Reviews and Sharing Your Thoughts

When using our website or mobile applications, you may be able to share information through social networks like Facebook and Blue Sky. For example, when you 'like', 'share' or review our Services. When doing this, your personal information may be visible to the providers of those social networks and/or their other users. Please remember it is your responsibility to set appropriate privacy settings on your social network accounts so you are comfortable with how your information is used and shared on them.

Security

Data security is of great importance to THBA Ltd and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure your collected data.

We take security measures to protect your information including:

Limiting access to our buildings to those that we have determined are entitled to be there (by use of key locks)

Implementing access controls to our information technology

We use appropriate procedures and technical security measures (including strict encryption, anonymisation and archiving techniques) to safeguard your information across all our computer systems, networks, websites, mobile apps and office space

Never asking you for your passwords

Advising you never to enter your account number or password into an email or after following a link from an email

What Happens If Our Business Changes Hands?

We have no plans to sell or transfer any part of our business. If that was to happen, any personal data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Notice, be permitted to use that data only for the purposes for which it was originally collected by us.

Changes to Our Privacy Notice

We may change this Privacy Notice from time to time (for example, if the law changes). We recommend that you check this policy regularly to keep up-to-date. For historic versions of this Notice, please contact us using the details below.

How To Contact Us

If you would like to exercise one of your rights as set out above, or you have a question or a complaint about this policy, the way your personal information is processed, please contact us by one of the following means:

By email: data@thba.co.uk

By post: 31 Derek Avenue, Epsom, KT19 9HP

Thank you for taking the time to read our Privacy Notice.