

International Connections Group Limited and its associated businesses ('we', 'us', or 'our') are committed to protecting and respecting the personal data that we hold. It applies to personal data provided to us, both by individuals themselves and by others on behalf of individuals. We may use personal data provided to us for the purposes described in this privacy policy or as made clear in another form before collecting personal data. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

Our contact details are:

International Connections Group Limited

8 Avroe Crescent

Blackpool

Lancashire FY42DP

Email: GDPR@internationalconnectionsgroup.co.uk

The International Connections group website is <https://internationalconnectionsgroup.co.uk> and is owned and operated by International Connections Group Limited .

We handle personal data for various purposes, and as a result, the methods of collection, lawful basis for processing, usage, disclosure, and retention periods for each purpose vary. Details regarding these aspects are outlined in the relevant sections below.

If we receive personal data from a third party concerning an individual, we request that the third party inform the individual about the relevant details regarding the use of their data. If needed, this privacy statement may be referenced for further information.

We also collect information automatically when you visit our website, namely your IP address, the pages you had previously visited or when you use our services, including usage, log and cookies information or similar technologies. Please refer to our Cookies policy.

PERSONAL DATA

Under the United Kingdom General Data Protection Regulation ('UK GDPR'), the Data Protection Act 2018 ('the Act') and the General Data Protection Regulation (Regulation (EU) 2016/679) ('EU GDPR'), personal data is defined as 'any information relating to an identified or identifiable natural person ('data subject'), by reference to an identifier such as a name.

THE DATA CONTROLLER

A data controller, according to relevant data protection laws and regulations, is the individual or legal entity responsible for managing and utilising personal data stored in either paper or electronic files. International Connections Group Limited serves as the data controller as defined by these laws and regulations.

LAWFUL PROCESSING

The lawful bases for processing personal data are outlined in Article 6 of the UK GDPR. At least one of these bases must apply whenever International Connections Group processes personal data:

- (a) Consent: You have provided freely given, specific, informed, or unambiguous consent for International Connections Group to process your personal data for a specific purpose.
- (b) Contract performance: The processing is necessary for the performance of a contract between you and International Connections Group, which required you to take specific steps before entering into the contract.

(c) Compliance with legal obligation: The processing is necessary for International Connections Group to comply with legal obligations related to tax, social security, and employment laws (excluding contractual obligations).

(d) Public interest: The processing is necessary for International Connections Group to carry out tasks in the public interest or for its official functions, with a clear legal basis.

(e) Legitimate interests: The processing is necessary for International Connections Group's legitimate interests or the legitimate interests of a third party, unless there are compelling reasons to protect the individual's personal data that outweigh these legitimate interests.

DATA RIGHTS

Your data subject rights are listed below:

the right of access;

the right to rectification;

the right to erasure or right to be forgotten;

the right to restriction of processing;

the right to be informed;

the right to data portability;

the right to object; and

right not to be subject to a decision based solely on automated processing.

Under the UK GDPR and the Act, you may ask for a copy of the information we hold about you and you may request rectifications be made to this information if it is inaccurate or not up to date.

To exercise any of the above writes, please write to:

International Connections Group Limited

8 Avroe Crescent

Blackpool

Lancashire FY42DP

Email: GDPR@internationalconnectionsgroup.co.uk

DATA THAT WE HOLD

Professional Services

We provide services to individuals as well as businesses, non-profits, and other organisations. The exact data held will depend on the services to be provided.

Where we engage with clients for professional services, we may collect and process personal data in order to satisfy a contractual obligation. We request that clients only provide the personal data that is required for us to fulfil our contractual obligation.

Why do we process data?

Where data is collected for professional services, it is used for a number of purposes, such as;

Delivering services to clients - involves processing data to fulfill the services outlined in our agreement with clients. Additionally, this may be elaborated upon in written documentation provided prior to any data processing.

Managing clients - involves processing personal data to effectively communicate with them and understand their requirements. This ensures that their needs are met appropriately, including assessing the suitability of services provided to them.

For administrative purposes, we collect and process personal data to manage and oversee our business operations and services. This encompasses various activities such as maintaining internal records, nurturing client relationships, organising events, managing client-facing applications, and upholding internal operational procedures.

What data is processed?

The data that is processed is dependent on the services that are being provided and on the recipient of the services.

Services to businesses, non-profits, and other organisations – we process the personal data of individuals associated with our clients. Personal data may include names, e-mail addresses, telephone numbers and location information.

Services to individuals – personal data may names, e-mail addresses, telephone numbers and location information such as home address if used for the business.

Business Contacts

Personal data from our contacts, which covers both potential and prior customers, as well as potential and prior employees, are held in our customer relationship management tool (CRM tool).

This information is entered into the CRM tool after contact is made between a Customer or staff member of International Connections Group and a business contact.

We use technology to profile our business contacts so that we can assess the health of our relationship with them. Where we process the data of business contacts, we rely on contract performance and legitimate interest, depending on the situation.

Why do we process data?

Where personal data on business contacts is held, it is used for the following purposes:

Promotion and development of our offerings;
Communication;
Hosting and facilitating of events;
Managing of our relationships; and
Administration and management of contracts.

What data do we hold?

Personal data that may be stored in the CRM tool includes, but is not limited to, names, email addresses, physical addresses, job titles, and details of the initial meeting.

In addition, personal data may be securely archived with restricted access and other appropriate safeguards where there is a need to continue to retain it.

Our people

We collect personal data for our people as part of the administration, management and promotion of our business activities.

Our Staff Handbook and consultancy agreements explain further how personal data is held for our staff, and consultants.

Applicants

Where an individual is applying to work for us, personal data is collected through the application process. Some data is collected through forms on the website, details of which can be found in the section describing people who use our website. Data collected on applicants via the website will be used for the purposes detailed below.

Why do we process data?

There are several purposes that personal data for applicants are collected, such as:

Employment – we process an applicant’s personal data in order to assess their potential employment at International Connections Group ; and Administration and management – we may also use this personal data in order to make informed management decisions and for administration purposes.

Suppliers

We collect and process personal data about our suppliers, subcontractors, and the individuals associated with them. The data is held to manage our relationship, to contract and receive services from them, and in some cases to provide services to our clients.

Why do we process data?

Receiving goods and services – we process personal data in relation to our suppliers and their staff as necessary to receive the services;

Providing services to our clients – Where a supplier is helping us to deliver services to our clients, we process personal data about the individuals involved in providing the services in order to administer and manage our relationship with the supplier and the relevant individuals and to provide such services to our clients;

Administering, managing and developing our businesses and services – We process personal data in order to run our business, including: managing our relationship with suppliers; developing our businesses and services, such as identifying client needs and improvements in service delivery;

maintaining and using IT systems; hosting or facilitating the hosting of events; and administering and managing our website and systems and applications. Security, quality and risk management activities – we have security measures in place to protect our and our clients’ personal information, which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to our suppliers. We collect and hold personal data as part of our supplier contracting procedures. We monitor the services provided for quality purposes, which may involve the processing of personal data.

Promoting our services – we may use business contact details to provide information that we think will be of interest in us and our services. For example, industry updates and insights, other services that may be relevant and invites to events.

Complying with any requirement of law, regulation or a professional body of which we are a member – we are subject to legal, regulatory and professional obligations. We need to keep certain records to show we comply with those obligations and those records may contain personal data.

What data do we hold?

We hold the data that is necessary for the purposes listed above. As an example, we will typically hold supplier’s names, contacts names, and contact details of suppliers.

People who visit our offices

Personal data is collected when individuals visit our offices via CCTV and a visitors' sign-in book. We have security in place at our offices, for the physical security of client information and for the benefit of our staff.

'CCTV in Operation' signs placed in the reception of our offices confirm that CCTV is deployed. The images are held securely with limited access, and only available when needed for investigating an incident.

The physical security measures we have in place represent the legitimate business interest.

Why do we process data?

CCTV and building access controls may require visitors to our offices to sign in at reception and keep a record of visitors. This is retained in case of theft or other incident, and to protect the staff and information in the office.

What data do we hold?

Personal data that may be stored on CCTV will be footage of those visiting our offices for the purposes of physical security of our premises.

People who use our website, mobile apps, and other means

When people visit our website, mobile apps, and other means, personal data is collected both through automated tracking and interactions with various forms on the website or apps (collectively referred to as the websites).

Personal data may also be collected when individuals contact us by phone, e-mail or otherwise. This includes information provided when an individual registers to use our websites, makes an enquiry, comments on publications, enters a competition, promotion, or survey, applies to work for an International Connections Group business or reports a problem with our websites.

When individuals visit our websites, certain personal data may be automatically collected.

We work closely with third parties who may collect data on our behalf (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers.).

Often, individuals who visit our website additionally fall into another category as listed by this privacy policy. For instance, users of our websites may be current clients, business contacts or become clients in the future. Where this is the case, data held and processed for individuals who use our website may also become data that is held and processed for another purpose.

Why do we process data?

There are several reasons why we will process the personal data that an individual may provide to us when visiting our websites. For examples, these include:

Administration – to administer our website and to improve internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes. For example, we use this data to ensure that the website is presented well for individuals and is optimised appropriately.

Functionality – in order to allow individuals to use some functionality of our website, certain personal data must be entered in order for features to work as intended.

Security – in order to keep our website safe and secure, we may sometimes collect personal data, for instance login information and other data that can be used to vouch an individual's identity.

Promotion and development of our offerings – some personal data may be used in order to measure or understand the effectiveness of advertising we serve to individuals, and to ensure that only relevant advertising appears.

What data do we hold?

The data that we hold depends on what data was entered and for what purpose.

Where data was entered to engage with functionality of our website, that personal data may include names, addresses, e-mail addresses and phone numbers.

Where data is collected automatically, including technical information, such as IP addresses used to connect an individual's computer to the internet, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system, and platform.

We may also collect other data about an individual's visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

Our website uses cookies to distinguish individuals from one another. This helps us to provide a better experience when individuals browse our website and, also allows us to improve our site. For detailed information on the cookies, we use and the purposes for which we use them see our Cookie policy.

SHARING PERSONAL DATA

We may share your data with International Connections Groups and with our associated businesses.

We may disclose your personal data to third parties when we are under a duty to disclose or share your personal data to comply with any legal obligation, or in order to enforce or apply any agreements, or to protect the rights, property, or safety of the organisation, or other individuals. We may also share your personal data with third parties when we are legally permitted to do so. Before engaging with third parties, we conduct vendor risk assessments and regulation tests to verify the compliance level of those third parties. When we decide to share your data with those third parties, we put contractual arrangements and security mechanisms in place to protect your data to maintain compliance with our data protection, confidentiality and security standards.

Personal data held by us may be transferred to:

Third-party organisations that provide applications/functionality, data collection and processing or IT services to us – we use third parties to support us in providing our services, obtaining feedback from our clients and prospective clients and to help provide, run, and manage our internal IT systems. For example, providers of information technology, cloud-based software as a service provider, identity management, website hosting and management, data analysis, data back-up, security, and storage service.

THIRD-PARTY WEBSITES

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

LOCATIONS OF PROCESSING

Where possible, personal data resides within the UK territory but may be transferred to, and stored at, a destination outside the UK. When this will be the case we will take reasonable steps to ensure that your data is treated securely, in accordance with this privacy policy.

If personal data is transferred outside the UK to a country without a designated adequacy rating, we will put in place appropriate safeguards pursuant to Article 46 of the UK GDPR or request the data subject's consent pursuant to Article 49 of the UK GDPR before processing the data.

SECURITY OF YOUR INFORMATION

To help protect the privacy of data and personally identifiable information you transmit through use of this our website, we maintain physical, technical and administrative safeguards. We update and test our security technology on an ongoing basis. We restrict access to your personal data to those employees who need to know that information to provide benefits or services to you. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

HOW LONG WE STORE YOUR PERSONAL DATA FOR

We store your personal data in accordance with our data retention policy. This policy is reviewed and updated internally to ensure we do not store your data for longer than is necessary. We also review how and where we store any data to ensure that we meet our obligation to store data securely.

In addition, some of the data we hold may be subject to certain legal and regulatory obligations, which provide a minimum retention period for different types of data. The retention period varies depending on the data we hold.

Furthermore, as outlined in this policy we collect data for different purposes and from different groups, for which is retain the information in different ways:

Professional Services

We retain the personal data processed by us in a live environment for as long as is considered necessary for the purpose(s) for which it was collected (including as required by applicable law or regulation, typically 6 years). We may keep data for longer in order to establish, exercise, or defend our legal rights and the legal rights of our clients.

Personal data we do not use is securely archived with restricted access and other appropriate safeguards where there is a need to continue to retain it.

Business Contacts

We retain the personal data processed by us for as long as is considered necessary for the purpose(s) for which it was collected. The personal data of business contacts shall not be retained where there is no evidence that a business contact is engaged with us or our communications.

Our People and the applicants

Personal data collected for applicants is held for as long as necessary in order to fulfil the purpose for which it was collected, or for a maximum of two years where those purposes no longer become necessary.

Suppliers

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation). Data may be held for longer periods where required by law or regulation and in order to establish, exercise or defend our legal rights.

People who visit our offices

Visitor records are accessed on a need to know basis only and by authorised personnel only. CCTV recordings are overwritten after 31 days unless an issue requiring investigation is brought to our attention.

People who use our website, mobile apps, and other means

We retain the personal data processed by us in a live environment for as long as is considered necessary for the purpose(s) for which it was collected (including as required by applicable law or regulation, typically 6 years).

In addition, personal data may be securely archived with restricted access and other appropriate safeguards where there is a need to continue to retain it.

For more information about our data retention schedule, please email us at dataprivacy@mks.co.uk

CHANGES TO THIS PRIVACY POLICY

This privacy policy was last updated on 19 March 2024. International Connections Groups limited reserves the right to vary this privacy policy from time to time. Such variations become effective on posting on this website. Your subsequent use of this website or submission of personal information to us will be deemed to signify your acceptance to the variations.

COMPLAINTS

For further information on your rights and how to complain to the ICO, please refer to the ICO website <https://ico.org.uk/concerns>

Contact details

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate)