

PRIVACY NOTICE – ECLIPSE ANALYTICS LTD

This privacy notice tells you what to expect us to do with your personal information.

Contact details

Post: Alliance House, 12 Caxton Street, London, SW1H 0QS

Email: tessa.hetherington@eclipseanalytics.com

What information we collect, use, and why

We collect or use the following information to **provide and improve products and services for clients**:

- Names and contact details
- Addresses
- Transaction data (including details about payments to and from you)
- Usage data (including information about how you interact with and use our website and services)
- Records of communications with clients and suppliers
- Records of meetings and decisions
- Account access information

We collect or use the following personal information for the **operation of client or customer accounts**:

- Names and contact details
- Addresses
- Purchase or service history
- Account information, including registration details

We collect or use the following personal information for **recruitment purposes**:

- Contact details (eg name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Right to work information

We collect or use the following personal information **as an employer**:

- Names and contact details
- Date of birth
- National Insurance number and bank details
- Official identification when necessary for making travel arrangements.
- Employment details (including salary, sick pay and length of service)

- Employment records (including appraisals, disciplinary information, leave taken, training records)
- Health and wellbeing information (such as emergency contact information, medical records or health conditions)
- Records of communications, meetings and decisions

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [You can read more about this right here.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [You can read more about this right here.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [You can read more about this right here.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [You can read more about this right here.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [You can read more about this right here.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [You can read more about this right here.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [You can read more about this right here.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide and improve products and services for clients** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Operating and improving our services to you and your organisation as a client.

Our lawful bases for collecting or using personal information for the **operation of client or customer accounts** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Operating and improving our services to you and your organisation as a client.

Our lawful bases for collecting or using personal information for **recruitment purposes** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Processing recruitment applications, conducting targeted recruitment approaches and/or ensuring individuals are aware of job opportunities. Such data will be held securely and retained only for so long as it is necessary for these purposes.

Our lawful bases for collecting or using personal information **as an employer** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

- Protecting and promoting the wellbeing of employees (for example in conducting risk assessments or arranging health or travel insurance).

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Where we get personal information from

- Directly from you
- Publicly available sources

How long we keep information

Your personal information will be stored securely on our IT systems and/or in hard copy within our offices.

We will retain your personal information only for so long as it is necessary to retain it for the purposes for which it was collected and for legal reasons.

Our retention schedule is as follows:

Type of Information	Retention Period
Supplier & Client Information	
Names, contact details, system access info	12 months after end of contract
Invoices, payment and account information	Six years after end of relevant tax year.
Usage data, records of communications, meetings, decisions	Six years after end of contract
Potential Supplier/Client Information	
Contact details	12 months from end of consideration
Records of communications, meetings	12 months from end of consideration
Employee Information	
General employment records, including contract, appraisals, absence and leave records, salary info, general pay records.	During employment and for 6 years from end of employment
Records of communications, meetings, decisions.	During employment and for 6 years from end of employment (where relevant).
PAYE and tax records, maternity/paternity/parental pay records	3 years after end of the relevant tax year
Recruitment Information	
Employment applications	12 months from application
Details of potential recruits	12 months from recruitment exercise
Records of recruitment decisions and discussion	12 months from recruitment exercise

Who we share information with

Data processors

Streets Accountants

This data processor processes our payroll information and provides accountancy services.

Others we share personal information with

- Insurance companies, brokers or other intermediaries
- Professional or legal advisors
- Organisations we're legally obliged to share personal information with
- Suppliers and service providers
- Professional consultants

Sharing information outside the UK

Where necessary, we may transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place.

For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us using the contact information provided above.

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>