**Privacy and Legal**

**Legal**

Crimson & Co and Argon & Co are part of Argon Groupe. Crimson & Co is the trading name of Crimson Consulting (UK) Ltd, which is incorporated in England and Wales under the Companies Act 1985 – No 4683556. Registered office: Crimson Consulting (UK) Ltd, 137 Euston road, London, NW1 2AA.

**Privacy**

Crimson Consulting (UK) Ltd (Crimson) takes your privacy very seriously and in compliance with Data Protection Act 2018 and the General Data Protection Regulations is committed to ensuring that your data and privacy is protected. Should we ask you to provide certain information by which you can be identified when interacting with us, you can be assured that it will only be used in accordance with this privacy statement.

Crimson is a data controller (referred to in this policy as ‘we’ or ‘us’) for data we collect through our website, when you make an enquiry, you are part of our Alumni or are looking to work for us.

We are data processor for the data we use in our relationships with our clients and whilst this data is mainly for business purposes and processing, we recognise that we will still be making use of personal data of the employees or business contacts with each client.

We may change this policy from time to time by updating this page. You should check this page periodically to ensure that you are happy with any changes. This policy was last updated February 2020.

**Data Collection**

**Personal data**

Crimson offers operations strategy and transformation services, and to provide you with these services we may collect personal information which we receive when you:

* Register or enquire of our services
* Download a report
* Join our mailing list
* Attend or approach us to attend one of our Alumni events
* Apply to join or work for Crimson
* Contact us or use our website

The data we may collect from you includes:

* Your personal details, which include your email address, phone number, company, job title and industry
* Your account login details, such as your username and the password that you have chosen
* Information about your online browsing behaviour on our website
* Information about any devices you have used to access our website (including the make, model and operating system, IP address, the address of the web site from which you linked, browser type and mobile device identifiers etc)
* HTTP protocol elements (your server address and top-level domain name (e.g. .com, .gov etc), date and time of visit, etc)
* Search terms

**Why we collect personal data**

Data we use is collected directly from you and is collected for the purposes of:

* Fulfilling our contractual services with you
* To provide you with services that you may request from us
* For our legitimate interests in making you aware of areas that may be of interest to you or to let you know about other product and services offered
* To provide you with updates when subscribing to our mailing list
* Meeting our legal and regulatory obligations as an employer
* For the safeguarding and care of our staff and guests
* For website and system administration
* For research and development

For our web users we collect data for statistical purposes only (e.g. to measure the use/performance of the site) except in the event of a security breach when they could be used for tracing the breach.

Any personal information that you provide to us will only be used for the purpose stated at the time we request it. This information will not be disclosed to a third party, with exception to the data input via the planning process maturity landing page which will be shared with Kinaxis. Data will be handled as per the Data Protection Act and the General Data Protection Regulations.

**How long we retain your personal data**

We will retain a record of your personal information. This is done to provide you with a high quality and consistent service. We will always retain your personal information in accordance with law and regulation and never retain your information for longer than is necessary.

**Data security**

**Keeping your information safe and secure**

We are committed to ensuring that your personal information is secure and protecting it from being inappropriately or accidentally accessed, used, shared or destroyed, and against it being lost. We are looking to be certified to the UK Cyber Essentials scheme as evidence of the security measures we take.

In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online and in paper form and only provide access to your data to only staff who require access.

We use iThemes security to keep our website data secure. iThemes collect the IP address of visitors, user ID of logged in users, and username of login attempts are conditionally logged to check for malicious activity and to protect the site from specific kinds of attacks. Examples of conditions when logging occurs include login attempts, log out requests, requests for suspicious URLs, changes to site content, and password updates. This information is retained for 30 days.

This site is scanned for potential malware and vulnerabilities. and is part of a network of sites that protect against distributed brute force attacks. To enable this protection, the IP address of visitors attempting to log into the site is shared with a service provided by iThemes.com. For privacy policy details, please see the iThemes privacy policy.

Kinaxis will hold your data in accordance to their policy which can be found here <https://www.kinaxis.com/en/privacy-policy>

**International data transfers**

In our normal business activities, we do not share data outside the EEA unless necessary within our own Group companies and only for the purposes of providing you with our services.

Personal data may be transferred to countries outside the EEA as part of the process of bidding for new work (i.e. employee CVs, visa or passport information as evidence of the right to work in a country).

Any data transferred outside the EEA will potentially be processed in countries that are not deemed as safe territories within the Data Privacy legislation so Crimson will only undertake these transfers to companies that have accepted our terms of business, which documents their data protection responsibilities and where we consider appropriate safeguards and security measures are in existence or where we have consent from you.

**Cookies**

**Definition and why they are used**

Cookies are small data files that allow a website to collect and store a range of data on your desktop computer, laptop or mobile device. Cookies contain information unique to your web browser which allow the website to remember your choices and preferences during your visit, but they do not include personal information that can identify you.

Cookies help us to provide important features and functionality on our website and we use them to improve your customer experience. Cookies help our website recognise your device and remember little bits of information about your visit like your preferences, settings and how you use the website. This information is then used to personalise and improve the way you interact with our site.

**How we use cookies**

We use cookies to do the following:

* Research and development: cookies can help us to understand how our Website is being used. These cookies are used in the management of the site and include recording visitor numbers and other web analytics. Cookies allow us to improve the way our website works so that we can personalise your experience.
* Measuring the effectiveness of our marketing communications: we use Cookies to measure the effectiveness of our marketing communications, for example by telling us if you have opened a marketing email that we have sent you.

**Google analytics and cookies**

Google Analytics is a web analytics service provided by Google, Inc., which uses cookies to help analyse how users use this website. The information generated by the cookie about your use of this Site (such as your IP address, the URL visited, the date and time the page was viewed) will be transmitted and stored by Google on servers in the United States. Google will use this information to monitor your use of this Site, compiling reports on website activity for website operators and providing other services related to website activity and internet usage. Google may transfer this information to third parties where required by law, or where such third parties process information on Google’s behalf. Our google analytics data is deleted every 26 months.

For more information about Google’s privacy policy in respect of Google Analytics, please refer to <http://www.google.com/analytics/learn/privacy.html>

You may opt out of Google Analytics by visiting <https://tools.google.com/dlpage/gaoptout?hl+en=GB>

**How to manage your cookies**

You may stop or restrict the placement of cookies on your computer by adjusting your settings in your web browsers. However, this may interfere with some of the functionality of the site. You can find more detailed information about how you can manage Cookies at the [all about cookies](http://www.allaboutcookies.org/) and [your online choices](http://www.youronlinechoices.com/uk/) websites.

**Sharing your data with third parties**

Access to your personal information is only allowed when required by the law or is required as part our fulfilling our service obligations. The only third party we share any data with is Kinaxis. The data shared is limited to the information gained via the Planning Process Maturity landing page and the assessments that follow. This landing page is a joint partnership with software providers Kinaxis. As such, Kinaxis will have access to our database and the data collected.

For our general data processing activities, we use the following to help us administer and monitor the services we provide:

* External IT support to ensure our IT and security measures are sufficiently robust to protect your data
* For database management of our client services
* For the administration and monitoring of our staff records
* For payroll and financial accounting
* To help us share information and administer the services when you subscribe to our mailing list
* For the provision of CCTV

**General**

**Links to other sites**

We sometimes provide you with links to other websites, but these websites are not under our control. Therefore, we will not be liable to you for any issues arising in connection with their use of your information, the website content or the services offered to you by these websites. We advise you to consult the privacy policy and terms and conditions on each website to see how each supplier may process your information.

**Access to collected information**

It is important that the personal information we hold about you is accurate and current. If you believe that any information, we are holding on you is incorrect or incomplete, please write to or email us as soon as possible. We will promptly correct any information found to be incorrect.

Under certain circumstances, you have rights under UK Data Protection Act 2018 (DPA) and the EU General Data Protection Regulation 2016/679 (GDPR) in relation to your personal information. You may have the right to:

* Access information held about you; your right of access can be exercised in accordance with data protection law
* Object to us processing or ask us to restrict our processing of your personal information for any of the purposes listed in this policy, at any time
* Ask us to update and correct any out-of-date or incorrect personal information that we hold about you free of charge
* Ask us to erase or delete your personal information (in certain circumstances). We will do our best to respond to such requests, but these are subject to certain limitations such as legal requirements
* Request a transfer of your personal information (in certain circumstances)

If you wish to exercise any of the above rights or to review, verify, correct or question anything detailed in this policy or are unhappy with any aspect of how we use your data please contact us at

* Call: +44 (0) 845 644 6972
* Email: information@crimsonandco.com
* Write: Crimson & Co, 137 Euston Road, Kings Cross, London NW1 2AA

You also 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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please [contact us](https://www.crimsonandco.com/contact-us/) in the first instance.

**Changes to our privacy policy**

We may change our Privacy Policy from time to time. Any changes will be published on our website which can be accessed at any time.

Copyright 2005 - 2020 Crimson & Co