

This website is owned by Gary Holmes trading as GH Specialist Police Procedural Consultancy Services ('we', 'our', or 'us').

If you have any concerns about this notice or your privacy please tell us. You can contact us through this website.

#### Introduction

This notice describes how we collect, store, transfer and use personal data. It tells you about your privacy rights and how the law protects you.

In the context of the law and this notice, 'personal data' is information that clearly identifies you as an individual or that could be used to identify you if combined with other information. Acting in any way on personal data is referred to as 'processing'.

We are committed to preserving the confidentiality of all information you provide to us including your personal data.

## Personal data we process

## 1. How we obtain personal data

The information we process about you includes information:

- you directly provide to us; and
- collected as a result of monitoring how you use this website.

## 2. Types of personal data we process directly

Direct interactions between us, such as when we provide our services to you, when you enquire about our services or otherwise when you contact us, require you to disclose personal data to us. This data may include:

personal identifiers, such as your first and last names

- personal contact information, such as your email address, your telephone number and your postal address
- business contact information, such as the name of the business for which you work, your personal business email address, your personal business telephone number and your business postal address
- general information about you: your role in the project for which our services are or may be used, and previous experiences relating to both personal life and your work
- transaction information, such as information about payments you have made to us and services we have provided to you
- records of communication between us including messages sent through this website, email messages and telephone conversations.

## 3. Types of personal data we collect from your use of our website

When you visit our website we process:

- technical information about the hardware and the software you use to access this website, including your Internet Protocol (IP) address, your browser type and version and your device's operating system; and
- usage information, including the frequency you use this website, the pages that you visit, whether you receive messages from us and whether you reply to those messages.

## 4. Special personal data

Special personal data is data about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. It also includes information about criminal convictions and offences.

Because of the nature of the services we provide, from time to time, you may disclose personal data to us that falls into the types classed as special category data.

The law enables us to process special category data under very specific conditions, for example, for journalistic purposes.

Where possible, we do not process special category data at all. If we do so, we ensure that additional care is given in safeguarding it and that it is retained only for so long as absolutely necessary.

## 5. Use of aggregated information

We may aggregate anonymous information such as statistical or demographic data for any purpose. Anonymous information is that which does not identify you as an individual. Aggregated information may be derived from your personal data but is not considered as such in law because it does not reveal your identity.

However, if we combine or connect aggregated information with your personal data so that it can identify you in any way, we treat the combined information as personal data, and it will be used in accordance with this privacy notice.

## 6. If you do not provide required personal information

Unless you provide us with the information we need to provide our services, we may not be able to perform all or part of any contract between us. If so, we will notify you of this at the time.

## The bases on information about you is processed

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 may continue to process your information.

### 7. Information processed under a contract

To provide our services, or in situations where you have requested that we provide our services, we must collect and record your personal data.

For example, before we provide our services to you, we may ask for personal information so that we can assess whether our services are suitable and how best we may be able to help you. We process this information on the basis of contract because there is a reasonable presumed intention to enter into a contract.

We continue to process this information until the contract between us ends or until we are otherwise no longer required to keep it.

## 8. Information we process with your consent

Through actions when otherwise there is no contractual relationship between us, such as when you agree to use of non-essential cookies on this website, you consent to us processing personal data, including personal identifiers, contact information and technical information.

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 telling us. However, if you do so, you may not be able to use this website or our services further.

Please be aware that we are not obliged by law to delete your personal data or to stop processing it simply because you do not consent to us doing so. While having your consent is an important consideration as to whether to process it, if there is another legitimate basis on which we may process it, we may do so on that basis.

# 9. Information we process for the purposes of legitimate interests

We may process personal data on the basis there is a legitimate interest, either to you or to us of doing so.

Where we process your information on this basis, we do so after having given careful consideration to:

- whether the same objective could be achieved through other means;
- whether processing (or not processing) might cause you harm; and
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so.

For example, we may process your information on this basis for the purposes of:

- the administration of our business;
- protecting and asserting the legal rights of any party
- protecting your interests where we believe we have a duty to do so

# 10. Information we process because we have a legal obligation

Sometimes, we must process your information in order to comply with a legal obligation.

For example, we may be legally required to disclose personal data where we are required by a court of law.

This may include your personal information.

## Further examples of when we might process personal data

## 11. Delivery of services using third party communication software

With your consent, we may communicate using software provided by a third party such as Apple (Facetime), Microsoft (Skype) or Zoom Video Communications (Zoom).

The providers of such software secure your personal data using encryption and other technologies and comply with all applicable privacy laws, rules, and regulations, including the GDPR.

If you have any concerns about using a particular software for communication, please tell us.

## 12. Service providers and business partners

We may share your personal data with businesses that provide services to us, or with business partners. In most circumstances, we shall ask for your consent before doing so.

As an example, we may use fraud prevention agencies and credit reference agencies to verify your identity and we may pass your information to those agencies if we strongly suspect fraud on our website.

#### 13. Cookies

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit a website that uses them. They allow information gathered on one web page to be stored until it is needed for use at a later date.

They are commonly used to provide you with a personalised experience while you browse a website, for example, allowing your preferences to be remembered.

They can also provide core functionality such as security, network management, and accessibility; record how you interact with the website so that the owner can understand how to improve the experience of other visitors; and serve you advertisements that are relevant to your browsing history.

The law requires you to give explicit consent for use of any cookies that are not strictly necessary for the operation of a website.

More information can be found in our cookie policy.

## 14. Personal identifiers from your browsing activity

Requests by your web browser to the servers for web pages and other content on this website are recorded.

This information is technical information, recorded for security purposes. Theoretically, if combined with other information known about you from previous visits, the data possibly could be used to identify you personally. However, we do not use it in such a way.

#### Other matters

## 15. Your rights

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 http://www.knowyourprivacyrights.org

## 16. Data may be processed outside the UK

Our websites are hosted in the United Kingdom.

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

For example, we may use services provided by Google, whose servers may be located in the United States of America.

Accordingly data obtained within the UK could be processed outside the UK.

If data may be transferred outside the UK, we ensure that the organisation that processes the data applies safeguards to the processing, and in particular, that the contracts between us and them require them to do so to the same standards as UK law requires.

## 17. Control over your own information

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal information changes.

At any time you may contact us to request that we provide you with the personal information we hold about you.

Please be aware that we are not obliged by law to provide you with all personal data we hold about you, and that if we do provide you with information, the law allows us to charge for such provision if doing so incurs costs for us. After receiving your 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.

## 18. Communicating

When you contact us, whether by telephone, through this website or by email, we collect the information you have given to us in order to reply.

We may keep personal information associated with your message, including personal identifiers and contact information so as to be able to respond to you.

## 19. Complaining

If you are not happy with this privacy policy or if you have any complaint then you should tell us.

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 sous 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.

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.

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 (ICO). This can be done at <a href="https://ico.org.uk/make-a-complaint/">https://ico.org.uk/make-a-complaint/</a>. However, we would appreciate that if you have a concern, you raise it with us before complaining to the ICO.

### 20. Retention period for personal data

We keep your personal information only for as long as required:

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

## 21. Compliance with the law

Our privacy policy complies with the law in the United Kingdom, specifically with the Data Protection Act 2018 (the 'Act') accordingly incorporating the EU General Data Protection Regulation ('GDPR'), and the Privacy and Electronic Communications Regulations ('PECR').

## 22. Review of this privacy policy

We may update this privacy notice from time to time as necessary.

#### Cookie notice

This is the cookie notice of Gary Holmes trading as GH Specialist Police Procedural Consultancy Services, which tells you about how we use cookies on our website.

It forms part of our privacy notice, which can be found at [https://ghpoliceconsultancy.co.uk/privacy-policy].

Our use of cookies complies with Privacy and Electronic Communications (EC Directive) Regulations 2003 and the Data Protection Act 2018.

#### **About cookies**

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.

## Our legal obligation to you

The law relates only to cookies that are not strictly necessary for the operation of a website, and not to all cookies.

As examples, it applies to cookies used to record your preferences relating to receiving marketing messages from us, but it does not apply to cookies that we use to record your preferences about use of cookies.

Our obligation to you is to tell you how we use cookies for certain purposes.

#### Our use of cookies

Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.

If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.

We use cookies in the following ways:

- to track how you use our website
- to record whether you have seen messages we display on our website, including whether you agree to use of non-essential cookies
- to provide you with a tailored experience of our website

• to record your responses to other user interactive features on our website

## If you no longer consent to use of cookies

Your web browser should allow you to delete cookies relating to any website. This should have the effect to resetting your preferences. Next time you visit a website, you should be asked whether you consent to use.

Your web browser should also have settings that allow you to prevent or limit use of cookies.

## Specific cookies that this website uses

Cookie	Domain	Туре	Description	Duration
YSC	youtube.com	Advertisement	This cookie is set by YouTube and is used to track the views of embedded videos.	session
VISITOR_INFO1_LIVE	youtube.com	Advertisement	This cookie is set by Youtube. Used to track the information of the embedded Youtube videos on a website.	5 months 27 days
test_cookie	doubleclick.net	Advertisement	This cookie is set by Doubleclick.net. The purpose of the cookie is to determine whether the user's browser supports cookies.	15 minutes
IDE	doubleclick.net	Advertisement	Used by Google Doubleclick and stores information about how the user uses the website and any other advertisement before visiting the website. This is used to present users with ads that are relevant to them according to the user profile.	1 year 24 days
yt-remote-device-id	youtube.com	Advertisement	This cookie is set by embedded Youtube videos.	never
yt-remote-connected-devi ces	youtube.com	Advertisement	This cookie is set by embedded Youtube videos.	never
CONSENT	youtube.com	Analytics	This cookie is set by embedded Youtube videos. It registers anonymous statistical data on for example how many times the video is displayed and what settings are used for playback. No senstive data is collected unless you log into your Google account, in that case your choices are linked with your account, for example if you click "Like" on a video.	16 years 4 months 18 days

## Other third party cookies

Other cookies may also be placed on your device by third parties whose services we use.

We do not have control over these cookies.