



ITG Privacy Policy
May 2018 V1.6



Overview

ITG holds and processes limited personal data on some of its clients' employees for the following reasons:

- To enable logging in to our technology (typically name, email address and contact phone number).
- For occasional communications, such as invitations to ITG events and important business or service delivery news (again, this would typically be name, email address and phone number).
- Communications (such as emails) that are exchanged between client employees and ITG employees.

Some of this data is classified as 'personal data' under the Data Protection Act and/or the new General Data Protection Regulation (GDPR). This privacy notice explains how and why we collect and control this data to ensure we fully comply with the Data Protection Act and EU law.

This privacy notice applies to all personal data ITG controls, whether the employee is based inside or outside the EU. The Data Protection Officer for ITG can be contacted on DataProtection@itg.co.uk

What information do we collect, control and processes – and why?

Collection

ITG only collects the information listed above and for the reasons stated. We only ever collect and process data that fully complies with the six lawful reasons to process personal data, which are given below:

- **Consent:** you have given clear consent for us to process your personal data for a specific purpose.
- **Contract:** the processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract.
- **Legal obligation:** the processing is necessary for us to comply with the law (not including contractual obligations).
- **Vital interests:** the processing is necessary to protect someone's life.
- **Public task:** the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.
- **Legitimate interests:** the processing is necessary for our legitimate interests or the legitimate interests of a third-party, unless there is a good reason to protect the individual's personal data that overrides those legitimate interests.

All client employees on whom we hold data will be made fully aware of how and why the data we hold on them will be used at the time we collect the data (such as when they register to use our technology). All 'opt in' consent will be shown in a clearly visible location.

Only data that are required for the stated function will be collected.

Profiling

ITG does not electronically profile any personal information.



Is this information shared?

We only use your data in the manner and for the purposes stated on collection. It will only be shared with approved third-parties who need to access it to carry out their duties in line with the services ITG offers to its clients.

We will also share personal data with the following external bodies when required to:

- Regulators and government authorities, such as HMRC or the police, if we are required to do so by law or if we regard the authority's request to be reasonable.
- Our insurers, legal advisers or other third-parties who need access to your data for managing, investigating or defending claims or complaints.
- A potential purchaser of ITG, or one of ITG's subsidiaries or parent companies that does work for you. This would only apply to clients who have agreed to be contacted for references or information).
- Organisations (such as third-party service providers) that process your data on our behalf. They are not allowed to use your data for any other purpose and are fully compliant to the ITG ISO 27001 due diligence third party management program.

You will be informed of any use of your personal data and the legal reason for its use. We take the security and confidentiality of your information very seriously.

International transfers

If we transfer personal data to recipients outside the EU/EEA, we use adequacy decisions, data transfer agreements or other EU-approved mechanisms for such transfers. ITG is certified within the Privacy Shield and ensures all its third-parties agree to the Privacy Principles. For further information, please contact the ITG Group Data Protection Officer on DataProtection@itg.co.uk or visit the Government Privacy Shield information page on www.privacyshield.gov.

Data retention

Personal data is stored for various lengths depending on the nature and purpose for which it was collected.

We store personal data in line with any applicable statutory minimum periods, and then review it periodically (usually annually) to ensure it is still necessary to be retained for the purpose for which it was collected. Where there is a statutory maximum length that data can be retained, we will delete on expiration.

All data retention periods can be found in the ITG Data Handling Policy. This can be accessed internally or on request by emailing DataProtection@itg.co.uk.



What are your data subjects rights?

The following is a summary of the rights given by the law to everyone whose personal data we hold in respect of that data.

- You have the right to obtain your personal data from us, except in exceptional circumstances (for example, if the information would hinder the prevention, detection or investigation of a crime).
- Where we provide it, the first copy will be free of charge, but we reserve the right to charge a small fee for additional requests to cover administration.
- You have the right to require us to rectify any inaccurate personal data we hold concerning you.
- Taking into account the purposes of the processing, you may also have the right to have incomplete personal data completed, by means of providing a supplementary statement or information.
- You have the right to require us to erase your personal data on certain limited grounds (including where they are no longer necessary for the purpose for which they were collected or where you withdraw your consent and there are no other legal grounds for processing).
- Where we process personal data either on the basis of consent or contractual necessity, and where you provided the personal data to us and we processed it by automated means, you have the right to require us to give you your data in a commonly used electronic format.
- You have the right to object to our processing your personal data that we process on the grounds of our legitimate interests, although we do not always have to honour your objection – we can refuse to cease processing where we have a compelling legitimate ground that outweighs your interests, or if we need the data to bring or defend a legal claim.

You have the right to require us to restrict the processing of your personal data on certain grounds, including where:

- You contest the accuracy of the personal data and want us to restrict processing of your personal data while we verify its accuracy.
- The processing is unlawful, but you request a restriction of the processing rather than erasure.
- We (as controller) no longer need the data for the purposes of the processing, but you have told us you require us to retain that personal data for you to establish, exercise or defend legal claims.
- You have objected to us processing your personal data on the grounds of legitimate interests and want us to restrict processing your personal data while we consider your objection.

If you would like to exercise any of these rights, please contact DataProtection@itg.co.uk.



Updating the Privacy Policy and keeping you informed

We strive for continuous improvement in our services, processes and protection of data subject rights. We will therefore update this privacy notice from time to time.

If we hold your data, we will make sure you are informed of any changes.

Our Data Protection Officer will make sure your information is kept safe throughout the ITG Group and ensure all parties are made aware of the relevant legislation.

Complaints

All complaints or concerns and appropriate resolutions relating to the practices around handling personal information will be logged. Any complaints of this nature should be made to the ITG Group Data Protection Officer at DataProtection@itg.co.uk

You also have the right to lodge a complaint with a supervisory authority if we cannot resolve your complaint.