



HARMONY BETWEEN HR & PAYROLL

HARP Privacy Policy

WHO WE ARE

HARP (HARP) a division of Controlaccount Ltd which is part of the Broadrider Group of Companies (GROUP), and we are based at Compass House, Waterside, Hanbury Road, Bromsgrove, Worcestershire B60 4FD. HARP is the Data Controller for any personal data that you provide to us as part of the services you are contracted to receive from us. As a client, you are our data subject.

HARP is committed to safeguarding and preserving your privacy when visiting our site or communicating electronically with us. This Privacy Policy, together with our Terms and Conditions, provides an explanation as to what happens to any personal data that you provide to us, or that we collect from you. This policy also explains how personal data is collected and used when you visit our website. It also explains how we process any data that you supply to us on this website, for instance to request a quote or to use our online services.

WHAT PERSONAL DATA DO WE COLLECT

The personal data we collect will depend on how you use our website. You can browse the site, you can fill in forms on the website to request information or quotes from us, download documents from us or you can subscribe to our emails, and other activities. The Group's websites collect personal data to provide these services. We collect information about you when you instruct us to provide advice; visit our website; subscribe to newsletters, receive our publications; apply for employment with us or engage in business dealings with us.

HARP processes your information to meet our statutory and any contractual obligations we may have with you in order to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process information in any way, other than as specified in this notice.

PERSONAL DATA WE DO NOT COLLECT

HARP does not collect any credit or debit card information.

HOW WE WILL USE YOUR PERSONAL DATA

When you visit our website, a record of your visit is made. Please see our Cookie Policy for information. The data that we collect and store relating to you is primarily used to enable us to provide our services to you. This data includes your device's IP address. The data is used completely anonymously, in order to determine the number of people who visit our website and the most frequently used sections of this site. This enables us to continually update and refine the site. The following table sets out how we handle your personal data and our legal basis for doing so under GDPR and the Data Protection Act 2018.

What we do	Our legal basis under UK GDPR
Use the personal data that you provide on our web forms and questionnaires	Article 6(1)(b) – when you provide us with your personal data, for example, if you wish to obtain a quote for our services, this is a necessary step to take at the request of the data subject prior to entering into a contract.
Provide our core services of health and safety, employment law advice, employment documentation and legal services	Article 6(1)(b) – this is necessary for the performance of a contract with you, our data subject.
Provide our online services platforms, HARP	Article 6(1)(b) this is necessary for the performance of a contract with you, our data subject.
Contacting you regarding the services we provide	Article 6(1)(f) – we need to contact you for our legitimate interests so that we can gather more information for the provision of our services, or to deliver those services, more effectively.
Retain your data under our retention policy after your contract has expired	Article 6(1)(f) we need to retain your personal data for only as long as necessary under the law to protect our legitimate interests.
Where you require us to make Reasonable Adjustments to enable you to attend a meeting or interview, we may require further information from you.	Article 9(2)(a) of UKGDPR (explicit consent). If this includes information about your physical or mental health, such information (being sensitive personal data, Special Category data), will only be used by us, with your explicit consent, to assess your eligibility for Reasonable Adjustments. We will not share or disclose it to others. You can withdraw your consent at anytime by contacting us. Please note that we may not be able to process your request for Reasonable Adjustments if you do this.

The following table sets out the categories of personal data that we obtain.

Personal Data	Description
Name, postal address, email address, website, identification number, location data, online identifier – these are classed as personal data.	This data is provided by you on our web forms and questionnaires, either to obtain a quote from us, subscribe to one of our newsletters, request a service from us or as part of the provision of your existing contractual services. This data may be provided if you apply for a job opportunity in the Group.
Special Categories of personal data are racial or ethnic origin, political opinions, sex life, sexual orientation, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying a natural person, or data concerning health.	This data is provided by you on our web forms and questionnaires, most regularly in relation to the utilisation of our HARP service or is provided when seeking advice and support in respect of any employment advice.

We may collect, use and disclose the information collected to compile statistical data and to: maintain our database; develop/improve our website; respond to any email enquiries; notify you of any upcoming marketing, training or other events that you have opted in to: provide you with publications; manage quality control; manage systems administration; attend to compliance issues; provide you or your organisation with advice and determine suitability for employment. We will not use or disclose your personal information for any other purpose which is not related (or in the case of sensitive information, directly related) to the above purposes without your consent unless otherwise authorised, required or permitted under the laws of England and Wales. Neither HARP, nor any member of the Group is engaged in selling your data to third parties.

WILL WE DISCLOSE YOUR DATA?

Personal data will only be disclosed on a confidential basis to external service providers so that they can provide services in connection with our business; and to any person (where necessary) in connection with their services, such as law enforcement, regulatory authorities, partners or advisors; or to companies within the Group. The handling of these operations is governed by a data processing contract between us and any external service provider, ensuring a commitment to the principals of UKGDPR and the Data Protection Act 2018. We ensure external service providers are only authorised to use personal data for the limited purposes specified in our agreement with them.

Further, we may use your data, or permit selected third parties to use your data, provided you have consented to receive information about unrelated goods and services which may be of interest to you. If you do not want us to use your data for our or third parties you will have the opportunity to withhold your consent to this when you provide your details to us on the form on which we collect your data. Please be advised that we do not reveal information about identifiable individuals to our advertisers, but we may, on occasion, provide them with aggregate statistical information about our visitors.

Where applicable, we may disclose your personal information to any member of our Group. This includes, where applicable, our subsidiaries, our holding company and its other subsidiaries (if any). We may also be required to disclose your personal information to third parties in the following circumstances:

- Where we sell any or all of our business and/or our assets to a third party
- Where we are legally required to disclose your information
- To assist fraud protection and minimise credit risk.

STORING YOUR PERSONAL DATA

We may transfer data that we collect from you to locations outside of the European Economic Area for processing and storing. Also, it may be processed by staff operating outside the European Economic Area who work for us or for one of our suppliers. For example, such staff maybe engaged in the processing and concluding of your order, the processing of your payment details and the provision of support services. In the event that any information is to be stored on servers which are hosted in non-EU countries, where this is the case, we will take steps to ensure that those providers use the necessary level of protection for your information and abide by the strict agreements and measures set out by Controlaccount Plc to protect your data and comply with the relevant data protection laws and Regulations. By submitting your personal data, you agree to this transfer, storing or processing. We will take all reasonable steps to make sure that your data is treated securely and in agreement with this Privacy Policy. Data that is provided to us is stored on our secure servers. Details relating to

any transactions entered into on our site will be encrypted to ensure its safety. The transmission of information via the internet is not completely secure and therefore we cannot guarantee the security of data sent to us electronically and transmission of such data is therefore entirely at your own risk. Where we have given you (or where you have chosen) a password so that you can access certain parts of our site, you are responsible for keeping this password confidential.

HOW LONG WE KEEP YOUR PERSONAL DATA FOR

Personal data from our data subjects is retained in line with our data retention policy. The Group keeps may retain data for up to 7 years, which covers the 6 years by law in which we are required to retain certain information for a minimum of 6 years plus the current year. Personal data that is no longer necessary to be kept under the Group's data retention policy will be deleted. Under the Group's data retention Policy, there are certain exemptions in relation to financial data and health data. A copy of the Group's retention policy can be made available upon request.

THIRD PARTY LINKS

On our website you may find links to third party websites. These websites should have their own privacy policies which you should check. HARP accepts no responsibility or liability for their policies whatsoever as we have no control over them.

YOUR RIGHTS

You have the following rights in relation to personal data held on you by the Group:

- The right to be informed about how personal data is used (this notice)
- The right to access a copy of personal data that the Group holds about you
- The right to rectification of any errors in personal data held by the Group
- The right to erasure of any personal data
- The right to restrict processing
- The right of data portability
- The right to object
- Rights in relation to automated decision-making including profiling

Information concerning a 'legal' rather than a 'natural' person is not personal data. Information about a limited company, or another legal entity identifying as a corporate body, which might have a personality separate to its owners or directors, does not constitute personal data and does not fall within the scope of the UK GDPR.

If you wish to learn more about these rights and how they operate, please refer to the Information Commissioner's Office (ICO) website <https://ico.org.uk/for-the-public/>. The Group does not operate any automated decision-making systems.

You have the right to request a copy of any personal data we may hold about you. Proof of your identity may be required for security purposes. If you are unhappy with the response that you receive from us when you exercise your GDPR or Data Protection 2018 rights, you have the right to lodge a complaint to the ICO. As a matter of business efficacy, any concerns you may have about your data in the first instance with HARP at enquiries@harpsoftware.co.uk before raising any concerns with the ICO. HARP will respond to complaints within a period of 30 days.

CONTACTING US

We welcome any requests for further information about our services and you can email us at enquiries@harpssoftware.co.uk or write to us at:

HARP, Compass House, Waterside, Hanbury Road, Bromsgrove, Worcestershire B60 4FD.