

## Privacy Policy

Surf In2 Careers Limited - for Career Companion associated websites including all Bespoke versions and CV Creator (updating Autumn 2023)

Surf In2 Careers processes basic personal data (i.e. contact details) of its customers, professional associates and suppliers. In exceptional cases of providing careers advice or coaching individuals, further personal data which may include their career and life history, or other coaching notes may be stored for a limited period. As they are individuals, we need to ensure that we have their consent for any contact we may make with them in future.

Surf In2 Careers holds no personal end user / client contact information.

Surf In2 Careers only holds Customer client personal details on computer data, which is encrypted, password protected, and protected by an anti-virus / anti-malware system.

Surf In2 Careers uses only 'Secure certificated and encrypted software' for its CV Creator service. No records are held for any users.

Surf In2 Careers occasionally publishes' articles authored by individual or professional careers writers.

No personal contact information is displayed See 2. below

Surf In2 Careers websites will be increasing its use of traffic log cookies from September 2024 to identify which pages are being used. This helps us analyse data about webpage traffic and so improve our website and tailoring to customer needs. We only use this information for statistical analysis.

Surf In2 Careers website does not collect any additional personal data, except any information sent via the Ordering Options form, which may be stored and used as per paragraph 1 or 2 below.

1. Personal Data of Customers – Careers organisations / Schools / Colleges / PRUs/  
SEND

A) TARGETED MARKETING PHONE CALLS

Surf In2 Careers may make occasional targeted marketing calls.

Lawful basis for contacting them: legitimate interest – to offer services which the data subject may require on behalf of their organisation.

Retention of personal data: indefinitely, unless informed of change of phone no, or requested to no longer contact them.

## B) USED TO SEND THEM TARGETED AND TAILORED MARKETING / PRODUCT UPDATE EMAILS

Lawful basis for contacting them: legitimate interest – to offer services which the data subject may require on behalf of their organisation.

Retention of personal data: until we are informed that they have left the organisation.

Privacy Statement: we add the following to the Surf In2 Careers (Career Companion Newsletters) for marketing emails:

Surf In2 Careers stores your name and email address (and phone no if known) securely on our computer, in order to contact you to make you aware or continue to update you on services we provide.

Please inform us by reply to this email if you no longer wish us to contact you in this way.

## 2. Personal Data of Professional Associates

### A) USED TO SEND THEM MARKETING/UPDATE EMAILS FROM THE SURF IN2 CAREERS DATABASE

Lawful basis: legitimate interest – they as a provider to Surf In2 Careers may well have an interest in developments in Surf In2 Careers. If they come to the point where they do not have such interest, they have the opportunity to opt out, as 1.B) above.

## 3. Personal Data of Suppliers

### USED TO CONTACT THEM BY PHONE OR EMAIL TO REQUEST PRODUCTS OR SERVICES.

Lawful basis for contacting them: in connection with a contract for goods or services.

Retention of personal data: as long as Surf In2 Careers is likely to require goods or services from them.

## 4. Personal Data of Surf In2 Careers Supporters

### USED TO SEND THEM EMAILS FROM THE SURF IN2 CAREERS DATABASE

Lawful basis: consent – they as family, friends or acquaintances may well have an interest in developments in Surf In2 Careers. Their consent will be sought to continue sending them updates, and if they come to the point where they no longer have such interest, they have the opportunity to opt out, as 1.B) above.

## Recording of requests for information or erasure and responses to them

When a request is received to provide personal data held by Surf In2 Careers on a data subject, (a 'subject access request') Surf In2 Careers will respond without delay with the data held on that person, and will record on a list of such requests the request, the date it was received, the response and the date of response.

When a request is received to erase someone's personal data, Surf In2 Careers will note the request on a list of such requests, to include the date of the request, name of organisation (if applicable), initials of the person concerned and action(s) taken, with date(s), to remove their data from all Surf In2 computer records.

When a request is received for Surf In2 Careers Limited to no longer contact a person, Surf In2 Careers will note the request on a list of such requests, to include the date of the request, name of organisation (if applicable), name of the person concerned and action(s) taken, with date(s), to remove them from contact lists. The Database may retain their details on a 'black list' to ensure that they are not emailed again from the system.

## Action in the event of a data breach

Should Surf In2 Careers Limited become aware of loss of or unauthorised access to any Personal Data held by Surf In2 Careers:

the incident will be investigated by the Company Secretary, who will conduct an assessment of the risks arising from the data breach

the need to inform the data subject(s) and organisations affected will be assessed, and if appropriate they will be notified as soon as practicable

if crime is suspected the police will be notified as soon as practicable and steps will be taken to prevent similar loss or unauthorised access in future.

## Queries or requests for information

If you have any queries on the above, or wish to know what personal information Surf In2 Careers holds relating to you, please contact the Director [hilary@careercompanion.co.uk](mailto:hilary@careercompanion.co.uk)

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