

# Privacy Policy for Everyone Else

## 1. INTRODUCTION

This notice applies to you if we process your personal information and you are not an employee or worker of ours, a prospective candidate employee or worker, a client of ours or an individual to whom we have provided a specific privacy notice. You may be, for example, be an individual that works at a supplier or another organisation that we deal with, an attendee at one of our marketing events, a user of our website or someone who is affected by our activities. References to you, your and yourself in this privacy notice are to either you as an individual or any organisation that you work for.

References to **we, our, or us** throughout this policy **are to** K3 Capital Group Limited, K3 Debt Advisory Limited, K3 Tax Advisory Limited and InTax Ltd.

InTax Ltd is a limited liability company incorporated in England and Wales. Registered Number 11271031; Registered Office: 20 St Andrew Street, London, EC4A 3AG

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your relationship with us. This notice explains how we comply with the law on data protection and what your rights are.

By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

## 2. SOURCES WE COLLECT YOUR PERSONAL INFORMATION FROM

We may collect, store and use the following kinds of personal information:

- information about your device and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths)
- Information that you provide to us when registering with our website or using our out of hours communications system such as your name, address, email address and telephone number.
- Information relating to your creditworthiness in order to establish whether to enter into or continue a business relationship with you
- Videos and photographs which your or other people take and provide to us or we take ourselves.

Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

## 3. USING PERSONAL INFORMATION

Personal information submitted to us through our website will be used for the purposes specified in this policy or on the relevant pages of the website.

We may use your personal information to:

- administer our website and business
- send you statements, invoices and payment reminders to you, and collect payments from you
- send you non-marketing commercial communications
- send you email notifications that you have specifically requested
- send you our newsletter, if you have requested it (you can inform us at any time if you no longer require the newsletter by contacting [marketing@intaxltd.com](mailto:marketing@intaxltd.com))
- send you marketing communications relating to our business which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications)
- deal with enquiries and complaints made by or about you relating to our website
- keep our website secure and prevent fraud

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We will not, without your express consent, supply your personal information to any third party for the purpose of their or any other third party's direct marketing.

## 4. WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We share personal information with the following parties:

- **Organisations in the same group as us:** in relation to joint events or joint work.
- **Other companies in our supply chain:** so that they can contact you about any issues in the supply chain or where your personal information is relevant to a subcontractor or party above us in the supply chain.
- **Credit reference and other identification agencies:** so that we can assess your creditworthiness and to verify your identity. These agencies may retain a footprint that a search has been undertaken.
- **Third parties who ask for or want referrals:** we may provide your details to a third party who is seeking services/products which are the same or similar to those that you provide.
- **Marketing and public relations companies:** to help us to develop, carry out and assess marketing and PR campaigns.
- **Other service providers and advisors to us:** such as companies that support our IT, help us analyse the data we hold, process payments, send communications to our customers, provide us with legal, property or financial advice and generally help us deliver our products and services to you or the organisation that you represent or for us to purchase them from you or the organisation you represent.
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives, for example HMRC or the Information Commissioner's Office.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

We also use Google Analytics which sets cookies to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website and blog, where visitors have come to the website from and the pages they visited. To opt out of being tracked by Google Analytics across all websites visit <https://tools.google.com/dlpage/gaoptout>.

We may provide third parties with aggregate statistical information and analytics about users of our products and services but we will make sure no one can be identified from this information before we disclose it.

We do not disclose personal information to anyone else except as set out above unless we have your consent or we are legally obliged to do so. We do not sell your data.

## 5. DIRECT MARKETING

From time to time, we may contact you by **email**, **post** or **SMS** with information about products or services we believe you may be interested in.

You can then let us know at any time that you do not wish to receive marketing messages by sending an email to us at [marketing@intaxltd.com](mailto:marketing@intaxltd.com). You can also unsubscribe from our marketing by clicking on the unsubscribe link in any marketing messages we send to you.

## 6. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect may be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure and where a third part processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws. For further details please contact us on [info@intaxltd.com](mailto:info@intaxltd.com).

In limited circumstances the people to whom we may disclose personal information as mentioned in the “Who

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**we share your personal information with”** section above may be located outside of the UK and European Union. In these cases we will impose any legally required protections to the personal information as required by law before it is disclosed. If you require more details on the arrangements for any of the above then please contact us on [info@intaxltd.com](mailto:info@intaxltd.com).

## 7. RETAINING PERSONAL INFORMATION

This Section 7 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.

Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

We will usually delete personal data falling within the categories set out below at the date/time set out below:

- All details will be deleted within 1 year.

Notwithstanding the other provisions of this Section 7, we will retain documents (including electronic documents) containing personal data:

- to the extent that we are required to do so by law;
- if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
- in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you move position or work for a different organisation or change your phone number or email address. You can contact us on [info@intaxltd.com](mailto:info@intaxltd.com).

## 8. SECURITY OF PERSONAL INFORMATION

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

We will store all the personal information you provide on our secure password- and firewall-protected servers.

All electronic financial transactions entered through our website will be protected by encryption technology.

You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password (except when you log in to our website).

## 9. YOUR RIGHTS

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;

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- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example we do not use automated decision making in relation to your personal data. However some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us on [info@intaxltd.com](mailto:info@intaxltd.com).

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

### 10. AMENDMENTS

We may update this policy from time to time by publishing a new version on our website.

You should check this page occasionally to ensure you are happy with any changes to this policy.

We may notify you of changes to this policy on our website.

### 11. COOKIES

Our website uses cookies.

A cookie is a file containing an identifier that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

We use both session and persistent cookies on our website.

### 12. CONTACTING US

In the event of any query or complaint with information we hold about you, please email [info@intaxltd.com](mailto:info@intaxltd.com) or write to us using one of the postal addresses in "Client Facing Entities in the K3 Capital Group."

### 13. CLIENT FACING ENTITIES WITHIN THE K3 CAPITAL GROUP

	Data Protection Supervisory Authority	Data Protection Regulation
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<p><b>K3 Capital Group Limited</b></p> <p>KBS House 5, Springfield Court, Summerfield Rd, Bolton BL3 2NT</p>	<p><b>Information Commissioners Office</b></p> <p><a href="https://ico.org.uk">ico.org.uk</a></p>	<p><b>Data Protection Act, 2018</b></p> <p><a href="https://gov.uk/data-protection">gov.uk/data-protection</a></p>
<p><b>InTax Ltd</b></p> <p>20 St Andrew Street London EC4A 3AG</p>	<p><b>Information Commissioners Office</b></p> <p><a href="https://ico.org.uk">ico.org.uk</a></p>	<p><b>Data Protection Act, 2018</b></p> <p><a href="https://gov.uk/data-protection">gov.uk/data-protection</a></p>
<p><b>K3 Debt Advisory</b></p> <p>KBS House 5, Springfield Court, Summerfield Rd, Bolton BL3 2NT</p>	<p><b>Information Commissioners Office</b></p> <p><a href="https://ico.org.uk">ico.org.uk</a></p>	<p><b>Data Protection Act, 2018</b></p> <p><a href="https://gov.uk/data-protection">gov.uk/data-protection</a></p>
<p><b>K3 Tax Advisory</b></p> <p>20 St Andrew Street London EC4A 3AG</p>	<p><b>Information Commissioners Office</b></p> <p><a href="https://ico.org.uk">ico.org.uk</a></p>	<p><b>Data Protection Act, 2018</b></p> <p><a href="https://gov.uk/data-protection">gov.uk/data-protection</a></p>