



# Nichols Privacy Policy

Date: 25 May 2018  
Version 1.0



Your privacy is very important to us. Accordingly, we have developed this policy in order for you to understand how we collect, use, communicate and disclose and make use of personal information. It also specifies the companies we work with that may use your data in the course of operations at The Nichols Group.

## Our aims

- Before or at the time of collecting personal information, we will identify the purposes for which information is being collected.
- We will collect and use personal information solely with the objective of fulfilling those purposes specified by us and for other compatible purposes, unless we obtain the consent of the individual concerned or as required by law.
- We will only retain personal information as long as necessary for the fulfilment of those purposes, or as required by law.
- We will collect personal information by lawful and fair means with the knowledge and consent of the individual(s) concerned.
- Personal data should be relevant to the purposes for which it is to be used, and, to the extent necessary for those purposes, should be accurate, complete, and up-to-date.
- We will protect personal information by reasonable security safeguards against loss or theft, as well as unauthorised access, disclosure, copying, use or modification.
- We will make readily available to user's information about our policies and practices relating to the management of personal information.



## **Your acceptance of this privacy policy**

This policy is effective from 25th May 2018. Your continued interaction with The Nichols Group and its products, services and events means that you are happy for us to use your personal information as described in this policy.

## **What data is covered under this policy**

This policy covers information about or linked to a natural person (personal information). It includes data we obtain from you, like your name, email address, phone number, IP address, or mobile device's operating system type, and may include financial information.

## **When do we collect your personal information?**

We may collect your information during your interactions with The Nichols Group events and services. It may be collected via online forms or through hard copy. It may also be collected through our social media channels and other online portals.

## **Why do we collect your data?**

We aim to provide quality and meaningful communications to you that support the aims and objectives of The Nichols Group. We may use the information provided to better understand how our products and services are used.

## **Do we share your information?**

We will not sell or lease your personal information. We won't distribute to 3<sup>rd</sup> parties unless we have your permission, are legally permitted, or required by law to do so.



# What are your rights?

## Access

You have the right to request us to provide you details of the personal information we hold about you. We will take no longer than 30 days to complete the request and we are obliged to fulfil this request for free, however, The Nichols Group reserve the right to charge a 'reasonable fee' for requests that are unfounded or excessive, particularly if they are repetitive.

We may also charge a 'reasonable fee' to comply with requests for further copies of the same information. This does not mean that we will charge for all subsequent access requests.

Our fee will be based on the administrative cost of providing this information.

Email [people@nichols.uk.com](mailto:people@nichols.uk.com)

## Correction

You have the right to ask us to correct our records if you believe they contain incorrect or incomplete information about you.

## Erasure

You have the right to erasure (deletion), without undue delay, of your personal information for which you later withdraw your consent to processing, or when it is no longer needed for the purpose it was originally collected. Data records required by law will be kept in some circumstances.

## Processing restrictions

You have the right to temporarily restrict our processing of your personal information if: you contest the accuracy of your personal information; you prefer we restrict its use rather than erase it; you need it to be preserved to establish, exercise, or defend a legal claim; whilst you are verifying whether we have overriding legitimate grounds to use it. You have the right to be informed before we lift the processing restriction.



## **Data portability**

You have the right to ask us to provide you (in a structured, commonly used, and machine-readable format without hindrance) personal information about you that we have which you had provided to us. You may ask us to transmit it directly to another controller if it is technically feasible.

## **Automated individual decision-making**

The Nichols Group does not currently employ automated processing/profiling that produce legal effects on individuals.

## **Complaints**

We endeavour to respond to you within 30 days from receipt of your correspondence related to privacy matters. However, you have the right to lodge a complaint with the Information Commissioner's Office online at <https://ico.org.uk/concerns/handling/>.



# Direct marketing and events communication

You always have the right to object to receiving direct marketing and/or events communication from us even if we believe that we have a legitimate interest to communicate with you in this way. You can contact us to request that we stop all direct marketing and/or events communication messages by calling 020 7292 7000 or emailing us at [gdpr@nichols.uk.com](mailto:gdpr@nichols.uk.com).

By opting out from receiving communications from us, this may mean you do not hear about events we are planning or information regarding new products and services.



# Data retention, storage and international data transfers

## **Data retention**

We will keep personal information only for as long as we need it to maintain our relationship with you or to provide information you requested, to comply with the law, and to ensure we do not communicate with individuals that asked us not to. We may also keep personal information. When we no longer need the information, we will dispose of it securely or delete accordingly.

## **Storage and international data transfers**

Nichols will always attempt to use UK based storage to keep the personal information we have. We may also store information in paper files. We may transfer personal information to reputable third party organisations situated inside or outside the European Economic Area. These organisations are required to safeguard personal information pursuant to their contractual obligations or participation in international data transfer mechanisms including the US-EU Privacy Shield framework.



# Nichols website

Our website is used to promote The Nichols Group its activities and offered services.

## Tracking and data collection

We use a Google Analytics to collect anonymous information about users' activity on the site, for example the number of users viewing pages on the site, to monitor and report on the effectiveness of the site and help us improve it.

Should you wish to opt-out of this feature, some of the services within our website may not be available to you.

If we do want to collect personally identifiable information through our website, we will make it clear when we collect personal information and will explain what we intend to do with it.

## Security

We are committed to ensuring personal information is secure. We have put security measures in place to attempt to protect against the loss, misuse, and alteration of personal information under our control. For example, we use secure server software (SSL) to encrypt your connect with the Nichols Website. Unfortunately, the transmission of data across the internet is not completely secure and whilst we do our best to try to protect the security of your information, we cannot ensure or guarantee that loss, misuse or alteration of data will not occur whilst data is being transferred. We also put administrative procedures in place to, for example, only allow authorised personnel to access systems containing personal information.

Users of our website are encouraged to report any issues via the contact form or by emailing [itservices@nichols.uk.com](mailto:itservices@nichols.uk.com).





## Children

The Nichols Group understands the importance of protecting children's privacy, especially in an online environment. In particular, our sites are not intentionally designed for or directed at children under the age of 13. It is our policy never to knowingly collect or maintain information about anyone under the age of 13, except as part of an engagement to provide professional services.

## Cookies

We use cookies to help us provide you with a better online experience. Most browsers automatically accept cookies but you can modify your browser setting to decline cookies.

For more information on cookies and how to opt-out visit. <https://cookiepedia.co.uk/all-about-cookies>

## Links to other websites

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit. We do not provide any guarantee or warranty for linked sites, and will not be liable for any loss arising from their use.



## Nichols platforms

The Nichols Group uses various platforms for the management of our personal data. We use these platforms to provide safe, secure and auditable methods of data storage.

If you do not want us to keep your data on any of our platforms, this will affect our ability to safely manage your data and to keep accurate financial records of your transactions with us.

It may also mean that we are unable to trade with you or offer any opportunities to you.

Data relating to 'Nichols Associates' will be verified on a regular basis for its accuracy and completeness.



## Sending us emails

Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with business policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.



# Changes to our Privacy Policy

By continuing to use the website or by submitting your information, you consent to the use of that information as set out in this Privacy Policy. If we change our Privacy Policy, we will post the changes to this document and may place notices elsewhere within the website for a reasonable period of time, so that you may be aware of the changes.

In the event of any changes, we will also update the 'Last Reviewed' date at the bottom of this Privacy Policy. You should check our Privacy Policy occasionally to ensure that you are happy with any changes we make. Your continued use of the website following any changes to this Privacy Policy will mean you accept those changes.



## How to contact us

As the **Data Controller**, The Nichols Group, if you want to request information about our Privacy Policy and any other policies that you believe may affect you, email [gdpr@nichols.uk.com](mailto:gdpr@nichols.uk.com) or write to:

The Nichols Group  
7-8 Stratford Place,  
London,  
W1C 1AY

We are committed to conducting our business in accordance with the principles set out above to ensure that the confidentiality of personal information is protected and maintained.

We are registered with the information Commissioners Office and our registration number is: **ZA106422**.

**Last Reviewed: 14 May 2018**