

# IMC WORLDWIDE GROUP

## PRIVACY POLICY

**The IMC Worldwide Group (IMC) which includes Aninver (an IMC Worldwide Company), is committed to protecting and respecting your privacy. This policy sets out the basis on which any personal data that you provide to us, or that we collect from you or a third party, will be processed. Please read the following carefully to understand how we will use your personal data and your rights in relation to it.**

**Data controllers:** IMC Worldwide (also referred to as IMC, us, our, we), 64-68 London

Road, Redhill, Surrey, RH1 1LG, United Kingdom including/or Aninver, (also referred to as Aninver , us, our, we Paseo de la Farola 8, entreplanta, Oficina 5, Malaga 20196, Spain.

**Represented by:** Steve Monger, IMC Finance Director who can be contacted through [GDPR@imcworldwide.com](mailto:GDPR@imcworldwide.com)

### 1 PURPOSE AND LEGAL BASIS OF PROCESSING

IMC and/or Aninver collect and processes personal data about individuals for a variety of reasons necessary to deliver our business. Our policy is to treat individuals fairly and within the terms of the law paying attention to the individual's right to privacy.

IMC and/or Aninver only processes or uses personal data for specific and legitimate purposes.

Personal data is held securely and confidentially.

The types of personal information we collect includes but is not limited to:

- Name
- Date of Birth
- Postal address
- Personal contact details (eg. telephone, email, or facsimile number)
- Occupation, references and previous employment history, qualifications and skills
- Information provided by you through our website, Facebook or Twitter accounts
- Information provided through other public media forums (e.g. LinkedIn, Devex, Indeed, etc)
- Bank Accounts
- Passports
- Your contractual and performance history with us
- Photographs
- Medical screening decisions

The lawful basis for processing may vary depending on the data being held. It may be held and processed for more than one legal basis.

<b>Purpose/Activity</b>	<b>Lawful Basis for Processing</b>
CV database – to assist with business winning and delivery activities	Legitimate Interest
Newsletter – to keep interested parties informed	Legitimate Interest
Correspondence with clients/partners/sub-contractors/Suppliers	Legitimate Interest
Contract/employment details	Contractual Necessity
Payment details including bank account details	Contractual Necessity
Medical declaration	Contractual Necessity
Medical screening data	Compliance with a legal obligation in accordance with GDPR article 9(2)b, see note 1 below

Personal information may be shared with third parties such as other members of IMC Worldwide, the Inland Revenue, Agencia Tributaria, Seguridad Social, Pension and Life Assurance providers, Insurance providers, medical assessment providers, Thomson Reuters World Check, company banks, clients or potential clients of IMC and/or Aninver, government banks and regulators. If within the EEA, some of these third parties may also be data-controllers. As an international development management consultancy company, we may sometimes need to share your data outside of the EEA. Where it is shared with our colleagues and offices overseas they will treat your data in the same way as we do in the United Kingdom and/or Spain. If your data is included in a proposal you will be specifically asked to confirm that you are happy for your data to be shared with the specified client who may be based outside the EEA.

## 2 USER REGISTRATION

The personal data requested from users in their registration to the IMC Newsletter via the IMC website ([www.imcworldwide.com](http://www.imcworldwide.com)) are automatically processed and incorporated into a personal data file which is the responsibility of IMC.

This data provided by a user must be true, accurate, complete and current and therefore the user is solely responsible for any loss or damage, directly or indirectly, that may be caused to IMC or any third party because of false, inaccurate or insufficient data.

*Note 1 - Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject*

By subscribing to the IMC Newsletter via the IMC website, the user expressly accepts freely and unequivocally that their personal data is processed by IMC for the following purposes:

- Sending of the IMC Newsletter by email
- Statistical studies
- Process requests or any type of request made by the user through any form of contact that is made available to the user on the IMC website
- Unsubscribing from the IMC Newsletter.

The user has the right to access the files, and may exercise their right to rectify, cancel and oppose at any time. The User can unsubscribe from the IMC Newsletter by clicking the unsubscribe link in the emails sent by IMC.

IMC will not disclose personal data provided to third parties without prior authorisation, except where expressly permitted by law, and subject to compliance with the requirements of such law.

### 3 RETENTION PERIODS

We will retain your personal data for as long as necessary. The duration depends on the nature of the personal data and the purposes for which it was received. We will also retain your personal data as required to fulfil our contractual obligations and to comply with our legal obligations, resolve disputes, and enforce our agreements.

Where we no longer need to process your personal data for the purposes set out above, we will delete your personal data from our systems.

### 4 YOUR RIGHTS

You have the right to:

- access any personal data we hold about you. We will provide details of the purposes of the processing, the types of personal data we hold and the people to whom your personal data has been disclosed;
- data Portability – Subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine readable format.
- have inaccurate or incomplete personal data corrected or to restrict the processing of personal data whilst the accuracy is checked;
- where data is held for legitimate business interest you have the right to ask to have personal data we hold about you erased. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law;
- withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent; and
- lodge a complaint with the Information Commissioner's Office if you have a concern about your personal data: <https://ico.org.uk/concerns/> held by IMC or for Aninver with the Agencia Española de Protección de Datos - AEPD

You can exercise your rights at any time by contacting us at [GDPR@imcworldwide.com](mailto:GDPR@imcworldwide.com)

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who does not have the right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

There is no charge for you to access your data, however, we reserve the right to charge a fee for reasonable administration costs where the request is excessive or to provide further copies of your data.

We aim to respond to all legitimate requests within one month.

## 5 SOURCES OF PERSONAL DATA

This policy applies to data received both from the individual or from third parties including partners, Thomson Reuters World Check, job boards such as Devex, Indeed, recruitment agencies and social media sites such as LinkedIn, Twitter, Facebook and Instagram.

## 6 RELATED POLICIES AND PROCEDURES

IMC Data Protection

Policy IMC Data

Retention Policy

IMC Ethical Use of Images Policy



Gavin English, Managing Director

