

Privacy Policy

Last updated: 25 May 2018

Sterlings Ltd (“us”, “our”, “we”) are committed to protecting and respecting your privacy.

This privacy policy (the “**Policy**”) sets out the types of personal data we collect and use when you access and visit www.sterlings.co.uk (the “**Website**”) and how we may use that information.

1. Introduction

This Policy covers our collection, processing and use of personal data when you use any of our Website.

When you supply any personal data to us we have legal obligations towards you in the way we use that data. For ease of reading, we have divided this Policy into several sections:

1. [Introduction](#)
2. [What is personal data and what do we collect](#)
3. [How and why do we use/share your information](#)
4. [For how long to we keep your information](#)
5. [Security](#)
6. [Your Rights](#)
7. [Further details](#)

It is important that you read this Policy together with any other privacy notice or fair processing notices that we may provide on the Website, or in other communications that we send to you, at or around the time that we collect or process personal data about you (for example, fair processing notices that we may display to you at the time that you sign up to receive e-mail updates from us) so that you are fully aware of how and why we are using that data.

This Policy supplements other notices including our Website [Terms and Conditions](#) and our [Cookies Policy](#) and is not intended to override or replace them.

We reserve the right to revise or amend this Policy at any time to reflect changes to our business or changes in the law. Where these changes are significant we will endeavour to let our clients and users of this Website know. However, it is your responsibility to check this Policy each time that you use this Website or wish to transfer personal data to us – for ease of reference the top of this Policy indicates the date on which it was last updated.

Please note that our Website is not directed at children under the age of 13 (each “Child” together “Children”) and we do not knowingly collect personal information about Children. If you believe we have collected personal information about your Child, you may contact us at privacy@sterlings.co.uk and request that we cease processing information about your Child.

2. What is personal data and what do we collect

What is personal data?

Where this Policy refers to ‘personal data’ it is referring to data about you from which you could be identified – such as your name, your date of birth, your contact details and even your IP address.

By law all organisations in the UK are obliged to process your personal data in certain ways and to ensure that you are given an appropriate amount of information about how they use it. You also have various rights to seek information from those organisations about how they are using your data, and to prevent them from processing it unlawfully. For more information about these rights, please see the ‘[Your Rights](#)’ section of this Policy.

Data we collect from you

Voluntary Provision of Data

When you voluntarily supply your personal data to us, for example where you: engage us as professional advisors, send correspondence to us, or engage in similar activities in which you volunteer data about yourself; we may collect, store and use the personal data that you disclose to us.

The information we collect from you may include your [title, name, address, e-mail address, company, job title, date of birth, phone number, and financial

information – but will depend on precisely what details you volunteer to us and the nature of any services that you engage us to provide.

Anti Money Laundering and Background Checking

Where you engage us to provide professional services we are obliged to take steps to ensure that your instructions are not connected with money laundering or other criminal conduct. Accordingly, we will use your personal data to conduct various checks to guard against this possibility.

Those procedures may cause us to obtain additional Personal Data relating to you. Where that occurs we may hold that data on file alongside information which you have provided directly.

Where our procedures indicate that your instructions to us are connected with criminal activity, we may be obliged to report that fact (and all information associated with it) to the relevant authorities.

Automated Collection of Data

We may also collect information about you when you visit the Website through the use of technologies such as cookies. The following are examples of information we may collect:

- information about your device, browser or operating system;
- your IP address;
- information about links that you click and pages you view on our Website
- length of visits to certain pages;
- subjects you viewed or searched for;
- page response times;
- records of download errors and/or broken links;
- page interaction information (such as details of your scrolling, clicks, and mouse-overs);
- methods used to browse away from the page; and
- the full Uniform Resource Locators (URL) clickstream to, through and from this Website (including date and time).

We use the data described above for several different reasons. Firstly we use it to ensure that the Website works properly and that you are able to receive the full benefit of it. Second, we use the data to monitor online traffic and audience participation across the Website. We undertake both of these activities because we have a legitimate interest in doing so.

Third Party Resources

We may also use the services of third parties to help us to collect various data about you and the way that you use the Website.

Where we use cookies to deliver these kind of services, the delivery of those cookies will be subject to your consent and you will be given the opportunity to refuse those cookies prior to them being delivered to your computer. You are also able to remove cookies from your computer at any time.

For details of the cookies that we use on the Website, what those cookies do, and the privacy policies of the third parties which provide them (where relevant) please see our [Cookies Policy](#).

Please note that, while you have to option to consent to specific individual cookies that, unless specifically set out in our [Cookies Policy](#), we rely on our legitimate interests as our condition for processing your personal data which we may receive from them on the basis set out in this section (specifically that we have a legitimate interest in optimising the Website's content and ensuring that you are served with relevant commercial communications as you use it).

3. How and why do we use/share your information

Sharing your information

Depending on how and why you provide us with your personal data we may share it in the following ways:

- we may share your personal information with any member of our company group;
- with selected third parties who we sub-contract to provide various services and/or aspects of the Website's functionality, such as where third party plugins provide functionality such as message boards or image hosting services (see "[Service Providers](#)" below); and
- with analytics and search engine providers that assist us in the improvement and optimisation of this Website as described above.

We will not share your information with third parties in order for that third party to provide direct marketing communications to you, unless it relates to a specific activity which you have been notified of, and you have indicated that you wish to receive communications about it.

We may also disclose your personal information to third parties in the following events:

- if we were to sell or buy any business or assets, in which case we might disclose your personal information to the prospective seller or buyer of such business or assets as part of that sale;
- if Sterlings Ltd or substantially all of its assets are acquired by a third party, in which case personal information held by us about our customers will be one of the transferred assets;
- if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or if we are asked to provide your details to a lawful authority in order to aid in the investigation of crime or disorder; and/or
- in order to enforce or apply our Website's terms of use, or the terms of any contract for services which you may enter into with us; or to protect the rights, property, or safety of our company, our clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Service Providers

Our service providers provide us with a variety of administrative, statistical, and technical services. We will only provide service providers with the minimum amount of personal data they need to fulfil the services we request, and we stipulate that they protect this information and do not use it for any other purpose. We take these relationships seriously and oblige all of our data processors to sign contracts with us that clearly set out their commitment to respecting individual rights, and their commitments to assisting us to help you exercise your rights as a data subject.

Links to third party sites

Where we provide links to third party websites such sites are out of our control and are not covered by this Policy. If you access third party sites using the links provided, the operators of these sites may collect information from you that could be used by them, in accordance with their own privacy policies. Please check these policies before you submit any personal data to those websites.

4. For how long do we keep your information

We will hold your personal information on our systems only for as long as required to provide you with the services you have requested or to perform the purpose for which that data was collected.

Where you engage us to provide professional services we are entitled to hold your personal data as part of our records after you cease to instruct us. We hold that data not only to satisfy various legal obligations to which our profession is subject, but also because we have a legitimate interest in keeping accurate records of the services which we have provided. However, we do not store your data indefinitely and we do not (without specific agreement) perform an archiving service for former clients. Accordingly, you can expect us to dispose of your data approximately seven years after you cease to instruct us.

Where you approach us to enquire about employment opportunities or to apply for an advertised vacancy we will keep your details and your application on file irrespective of whether you are successful or not. We do this on the basis that we have a legitimate interest in ensuring that we are able to contact you should a suitable vacancy arise in the future. However, we will not keep your details on file indefinitely, and you can expect us to dispose of your details within a year of your original application.

Where you sign up to receive e-mail marketing from us we will retain your e-mail address on file should you ever 'opt-out' of receiving those e-mails from us. We will retain your e-mail address in this way in order to ensure that we continue to honour and respect that opt-out request.

In some circumstances you can ask us to delete your data: see '[Your Rights](#)' below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

5. Security

Please note that some of our service providers may be based outside of the European Economic Area (the "EEA"). By submitting your personal information to us, you agree to this transfer, storing or processing. Where we transfer your data to a service provider that is outside of the EEA we seek to ensure that appropriate safeguards are in place to make sure that your personal data is held securely and that your rights as a data subject are upheld. If you would like more information

about how the mechanism via which your personal data is transferred, please contact: privacy@sterlings.co.uk.

If we ever give you (or where you have chosen) a password which enables you to access certain parts of this Website, or any of our secure document transfer services, you are responsible for keeping that password confidential. We ask you not to share a password with anyone.

6. Your Rights

As a data subject you have a number of rights in relation to your personal data. Below, we have described the various rights that you have, as well as how you can exercise them.

Right of Access

You may, at any time, request access to the personal data that we hold which relates to you (you may have heard of this right being described as a “**subject access request**”).

Please note that this right entitles you to receive a copy of the personal data that we hold about you in order to enable you to check that it is correct and to ensure that we are processing that personal data lawfully. It is not a right that allows you to request personal data about other people, or a right to request specific documents from us that do not relate to your personal data.

You can exercise this right at any time by writing to us at privacy@sterlings.co.uk and telling us that you are making a subject access request. You do not have to fill in a specific form to make this kind of request.

Your Right to Rectification and Erasure

You may, at any time, request that we correct personal data that we hold about you which you believe is incorrect or inaccurate. You may also ask us to erase personal data if you do not believe that we need to continue retaining it (you may have heard of this right described as the “right to be forgotten”).

Please note that we may ask you to verify any new data that you provide to us and may take our own steps to check that the new data you have supplied us with is right. Further, we are not always obliged to erase personal data when asked to do so; if for any reason we believe that we have a good legal reason to continue processing personal data that you ask us to erase we will tell you what that reason is at the time we respond to your request.

You can exercise this right at any time by writing to us at privacy@sterlings.co.uk and telling us that you are making a request to have your personal data rectified or erased and on what basis you are making that request. If you want us to replace inaccurate data with new data, you should tell us what that new data is. You do not have to fill in a specific form to make this kind of request.

Your Right to Restrict Processing

Where we process your personal data on the basis of a legitimate interest (see the sections of this Policy which explain **how and why we use your information**) you are entitled to ask us to stop processing it in that way if you feel that our continuing to do so impacts on your fundamental rights and freedoms or if you feel that those legitimate interests are not valid.

You may also ask us to stop processing your personal data (a) if you dispute the accuracy of that personal data and want us verify that data's accuracy; (b) where it has been established that our use of the data is unlawful but you do not want us to erase it; (c) where we no longer need to process your personal data (and would otherwise dispose of it) but you wish for us to continue storing it in order to enable you to establish, exercise or defend legal claims.

Please note that if for any reason we believe that we have a good legal reason to continue processing personal data that you ask us to stop processing, we will tell you what that reason is, either at the time we first respond to your request or after we have had the opportunity to consider and investigate it.

You can exercise this right at any time by writing to us at privacy@sterlings.co.uk and telling us that you are making a request to have us stop processing the relevant aspect of your personal data and describing which of the above conditions you believe is relevant to that request. You do not have to fill in a specific form to make this kind of request.

Your Right to Portability

Where you wish to transfer certain personal data that we hold about you, which is processed by automated means, to a third party you may write to us and ask us to provide it to you in a commonly used machine-readable format.

Because of the kind of work that we do and the systems that we use, we do not envisage this right being particularly relevant to the majority of individuals with whom we interact. However, if you wish to transfer your data from us to a third party we are happy to consider such requests.

Your Right to stop receiving communications

Where we send you e-mail marketing communications (or other regulated electronic messages) you have the right to opt-out at any time. You can do this by using the 'unsubscribe' link that appears in the footer of each communication (or the equivalent mechanism in those communications).

Alternatively, if for any reason you cannot use those links, or if you would prefer to contact us directly – you can unsubscribe by writing to us at privacy@sterlings.co.uk and telling us which communications you would like us to stop sending you.

Your Right to object to automated decision making and profiling

You have the right to be informed about the existence of any automated decision making and profiling of your personal data, and where appropriate, be provided with meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing that affects you.

Exercising your rights

When you write to us making a request to exercise your rights we are entitled to ask you to prove that you are who you say you are. We may ask you to provide copies of relevant ID documents to help us to verify your identity.

It will help us to process your request if you clearly state which right you wish to exercise and, where relevant, why it is that you are exercising it. The clearer and more specific you can be, the faster and more efficiently we can deal with your request. If you do not provide us with sufficient information then we may delay actioning your request until you have provided us with additional information (and where this is the case we will tell you).

7. Further Details

If you have any queries regarding this Policy, if you wish to exercise any of your rights set out above or if you think that the Policy has not been followed, please contact us at privacy@sterlings.co.uk.