

Privacy Statement

1.1 Who Are We?

Eunomia Research & Consulting is registered in England Wales under company no 04150627. Our registered office address is 37 Queen Square, Bristol, BS1 4QS, and we also have offices based in London, Manchester, Brussels, New York and New Zealand.

We are an independent organisation, dedicated to helping our clients achieve better environmental and commercial outcomes. Our client base includes organisations involved with waste management, energy generation, technology, utilities, financial institutions, UK central government, local authorities, regional bodies, the EU, selected foreign governments, charities and third sector organisations.

Eunomia is committed to protecting data and respecting the privacy of persons it deals with. This Privacy Policy explains when, and why we collect personal information about people who visit our website, our clients and staff, how we use it, the conditions under which we may disclose it to others, the lawful basis for processing, retention periods and how we keep it secure. Eunomia Research & Consulting Limited are registered with the ICO (Information Commissioner's Office registration no ZA168907, due for renewal on 22/1/19).

1.2 Visitors to our Website

When someone visits www.eunomia.co.uk we use a third party service, [Google Analytics](#) or [Wordpress](#), to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow [Google Analytics](#) or [Wordpress](#) to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

1.3 Use of Cookies by Eunomia

You can read more about how we use cookies on our [cookies](#) .

1.4 Search Engine

Our website search and decision notice search is powered by [Wordpress](#). Search queries and results are logged anonymously by our Marketing team, to help us improve our website and search functionality. No user-specific data is collected by either Eunomia or any third party.

1.5 E-newsletter

We use a third party provider, [Mailchimp](#), to deliver our monthly e-newsletters. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter.

1.6 Security and Performance

Eunomia uses a third party service, [Marcom](#) to help maintain the security and performance of our website. To deliver this service it processes the IP addresses of visitors to the Eunomia website.

1.7 People Who Contact Us Via Social Media

We use third party providers [LinkedIn](#), [Twitter](#), [YouTube](#), [Instagram](#) to manage our social media interactions.

If you send us a private or direct message via social media, the message will be stored by Twitter, YouTube and Instagram in accordance with the respective company's privacy policies. It will not be shared with any other organisations.

1.8 Client Data

- 1) Our clients may engage us to perform professional services which involves sharing personal data they control as part of that engagement. We may also process personal data under our client's control. In which case we will retain that data in a secure manner. Our contractual terms and conditions have been considered in line with the changes implemented by GDPR. On an ongoing basis, these will be reviewed to reflect our commitment to maintaining a high standard of data protection. Where applicable our clients will be regularly updated in respect of our commitment to their data protection and our adherence to GDPR.
- 2) Where we need to process personal data to provide professional services, we ask our clients to provide the necessary information on the data subjects regarding its use. Our clients may use relevant sections of this privacy statement, or refer their data subjects to this privacy statement if it's considered appropriate to do so. We process personal data to run our business, this includes managing our client relationships, developing our business services, maintaining and using IT systems, managing our website and associated systems.
- 3) As with any professional services provider, we must comply with legal, regulatory and professional obligations, and in-so-doing must retain certain records to demonstrate compliance to those obligations and our Data Retention Policy. These records may contain personal data.
- 4) We process personal information for certain legitimate business purposes, only where Personal Data can be directly linked to the client services provided by Eunomia. The circumstances in which we store and process Personal Data include at least one of the following:
 - To enable us to enhance our services to the benefit of our clients;
 - To enhance the security and risk profiling of existing and future business relationships; and
 - To communicate with clients and business partners in order to develop new business opportunities.
- 5) Whenever we process data for these purposes, we will ensure that we always keep your Personal Data rights in high regard and take account of these rights. We will retain Personal Data in order to make contact with individuals where there is a

legitimate case to do so. This is based on the assumption that individuals would prefer not to experience the disruption of excessive requests for consent to store their information. However, you have the right to object to this processing, and if you wish to do so please contact info@eunomia.co.uk.

1.9 Business Contacts

Eunomia processes personal data about contacts (existing and potential clients and/or individuals associated with them). The collection of personal contact data may be obtained from email contact with us, by phone or by electronic calendar invitations. The information we may capture is name, telephone number, email address and other business contact details. This information will be retained for as long as it is necessary for the purposes set out (ie for as long we need to keep a record of a relationship or business contact).

1.10 People Who Email Us

We use [Westgate IT](#) to encrypt and protect email traffic. If your email service does not support this organisation, you should be aware that any emails we send or receive may not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

1.11 People Who Make a Complaint to Us

- 1) If we receive a complaint from a person, we create a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.
- 2) We will only use the personal information we collect to process the complaint and to check on the level of service we provide.
- 3) We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that, however, it may not be possible to handle a complaint on an anonymous basis.
- 4) We will keep personal information contained in complaint files in line with our Retention Policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.
- 5) Similarly, where enquiries are submitted to us, we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

1.12 People Who Register (Notify) under the General Data Protection Rules (2018)

- 1) When individuals or a business fills in registration forms to obtain information on Eunomia via our website, they are asked to provide the contact details of a relevant

member of staff. This information is used for Eunomia's purposes, if we have a query about a registration, it will not be shared with any parties, or used for other purposes.

- 2) When we request information as part of the registration process, we will make it clear where the provision of information is required by law and where it is voluntary.

1.13 Job Applicants, Current and Former Eunomia Employees

Eunomia Research & Consulting Ltd is the data controller for the information you provide during the process unless otherwise stated. If you have any queries about the process or how we handle your information please contact us at jobs@eunomia.co.uk.

1.13.1 What Will We Do With the Information You Provide to Us

- 1) All of the information you provide during the process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.
- 2) We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes, or store any of your information outside of the European Economic Area. The information you provide will be held securely by us, whether the information is in electronic or physical format.
- 3) We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.
- 4) We retain information on our employees for a period of 7 years after their termination date.

1.13.2 What information Do We Ask For, and Why?

- 1) We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.
- 2) The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for, but it might affect your application if you don't.
- 3) Please note that if an individual is recruited as an employee, we are legally required to hold certain information to fulfil our statutory obligations, this may include (but is not limited to, name, contact information, next of kin, payroll related information, passport, driving licence, nationality, date of birth etc). This information will be held by us, in line with UK tax law, for a period of 7 years from the termination of your employment, after which it will be destroyed, with the exception of minimum information which will enable us to complete employee references). We therefore undertake to hold personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract an individual holds with us, subject to our annual review of data. We may therefore contact individuals from time to time, to request that they confirm whether they still wish their details to be retained.

1.13.3 Application Stage

- 1) If you use our online application system, this information will be processed by our in-house HR team. We may also obtain personal data about candidates from an employment agency, and other parties, including former employers and employees.
- 2) We ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for. Our HR & Admin team will have access to all of this information.

1.13.4 Shortlisting

Our management team shortlist applications for interview, based on suitability (qualifications and experience).

1.13.5 Assessments

- 1) We might ask you to attend an interview or undertake some form of psychometric (or other) testing. Information will be generated by you and by us. For example, you might complete a written test or we might take interview notes. This information is held by Eunomia.
- 2) If you are unsuccessful following assessment for the position you have applied for, we may ask if you would like your details to be retained in our talent pool for a period of six months. If you say yes, we would proactively contact you should any further suitable vacancies arise. After this period, your details will be destroyed, unless you contact us and ask us to retain them for a further 6 month period.

1.13.6 Conditional Offer

- 1) If we make a conditional offer of employment we will ask you for information, so that we can carry out pre-employment checks, which must be successfully completed before a final offer would be made. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability. You will therefore be required to provide:
 - Proof of your identity – you will be asked to attend our office with original documents, we will take photocopies/scans.
 - Proof of your qualifications – you will be asked to attend our office with original documents, we will take photocopies/scans.
 - We will directly contact your referees, using the details you provide in your application to obtain references
- 2) If we make a final offer, we will also ask you for the following:
 - Bank details – to process salary payments
 - Emergency contact details – so we know who to contact in case you have an emergency at work
 - Equal Opportunities Monitoring form.
- 3) Please note that if an individual is recruited, we are legally required to hold some types of information to fulfil our statutory obligations (for example, under UK tax law, we are required to keep basic personal data on our employees for a minimum of 7 years,

after which time it will be destroyed, unless the employee gives us their permission to retain their information for the purpose of employment reference provision). We therefore undertake to hold personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract an individual holds with us, subject to our annual review of data. We may therefore contact individuals from time to time, to request that they confirm whether they still wish their details to be retained.

1.13.7 Post Start Date

Our Code of Conduct requires all staff to declare if they have any potential conflicts of interest. If you complete a declaration, the information will be held on your personnel file.

1.13.8 Use of Data Processors

In the event that we use any third party data processors they are prohibited from doing anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

1.13.9 How Long is the Information Retained For?

- 1) If you are successful, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment, plus 7 years following the end of your employment.
- 2) If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 6 months from the closure of the campaign. Similarly, information generated throughout the assessment process, for example interview notes, is retained by us for 6 months following the closure of the campaign. This is identified in our Documentation Retention Policy.

1.13.10 How We Make Decisions About Recruitment

- 1) Final recruitment decisions are made by the management team, with assistance from our HR team. All of the information gathered during the application process is taken into account.
- 2) You are able to ask about decisions made about your application by speaking to your contact within our recruitment team or by emailing jobs@eunomia.co.uk.

2.0 Your Rights

Under the General Data Protection Regulations 2018, you have rights as an individual which you can exercise in relation to the information we hold about you.

You can read more about these rights here – [ICO - is my information being handled correctly](#)

3.0 Complaints or Queries

- 1) Eunomia intends to meet the ICO's standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage anyone with a concern to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.
- 2) This privacy notice does not provide exhaustive detail of all aspects of Eunomia's collection and use of personal information, but we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.
- 3) If you want to make a complaint about the way we have processed your personal information, you can contact us on HR@eunomia.co.uk.

4.0 Access to Personal Information

- 1) Eunomia aims to be as open as it can, in terms of giving individuals access to their personal information. You can find out if we hold any personal information by making a 'subject access request' under the General Data Protection Regulations 2018. We will not make a charge for this information, however if the request is particularly complex or if there are numerous requests, then the timescale can be extended by up to two further months. If we need to ask for such an extension, we will notify the individual of the extension within one month of the receipt of the SAR (subject access request), including the reasons for the delay. If we do hold information about you we will:
 - give you a description of it;
 - tell you why we are holding it;
 - tell you who it could be disclosed to; and
 - let you have a copy of the information in an intelligible form.
- 2) To make a request for any personal information we may hold, you need to put the request in writing addressing it to our marketing@eunomia.co.uk (for persons that supplied information via our website, or jobs@eunomia.co.uk (for persons that have information supplied in connection with potential/employment), or writing to the address provided below.
- 3) If you agree, we may try to deal with your request informally, for example by providing you with the specific information you need over the telephone.
- 4) If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting marketing@eunomia.co.uk (for persons that supplied information via our website, or jobs@eunomia.co.uk (for persons that have information supplied in connection with potential/employment).

4.1 Disclosure of Personal Information

In most circumstances we will not disclose personal data without consent, however there may be occasions when this is not the case. You can therefore get further information on:

- agreements we have with other organisations for sharing information;
- circumstances where we can pass on personal data without consent for example, to prevent and detect crime, and to produce anonymised statistics, or comply with legislation;
- our instructions to staff on how to collect, use and delete personal data; and
- how we check that the information we hold is accurate and up to date.

4.2 Persons under 16 using our Website

Eunomia is committed to protecting the privacy of children that visit our website, and who are under the age of 16. With this in mind, visitors to our website that are under the age of 16 are requested to obtain the permission of their parent or guardian, prior to submitting personal information onto our website.

4.3 Links to Other Websites

This privacy notice does not cover the links within this site which redirect you to other websites. We encourage you to read the privacy statements on any other websites you visit, to satisfy yourself that those organisations comply with protecting your personal information under GDPR.

4.4 Changes to This Privacy Notice

We keep our privacy notice under regular review. This privacy notice was last updated on 24 May 2018.

4.5 How to Contact Us

If you want to request information about our privacy policy, you can email us on HR@eunomia.co.uk or write to us at Eunomia Research & Consulting Limited, 37 Queen Square, Bristol, BS1 4QS.