# Privacy Policy Use of Your Personal Data

#### 1. Our principles of data protection

Our approach to data protection is built around four key principles. They're at the heart of everything we do relating to personal data.

- Transparency: We process personal data in an open, honest and transparent way.
- Security: We ensure security through good organizational practice as well as technical measures, this is at the heart of what we do
- Accountability: We promote the practice of good governance, and responsibility that comes with processing personal data.
- This Privacy Notice is intended to set out your rights and answer any queries you may have about your personal data.

#### 2. Who is DCLP Consultants America Inc?

We are an outsourcing administration specialist and sole agent in the USA for cashflow structure. We are a Data Controller and are responsible for determining what personal data is processed and for that purpose. You have rights about how we process your data which are listed in the section "Your Privacy Rights" below.

#### 3. What information do we collect?

From the moment you contact us, whether it be via email, telephone, visiting our website, or some other means, we start collecting information about you. In some cases, this is done when you provide information to us directly, but in other times it may be collected automatically.

# When visiting our website

## 1. Data types we collect

We may place use session cookies for our own use and management and to allow the website to function as expected. Our webservers themselves may log IP addresses as part of their normal function.

## 2. How and why we use the data

Our own cookies are sometimes used to enable functionality on the website, and if you disable these the website may not perform as expected, or you might have limited access to areas for features.

# 3. Third parties who have access to this information

Cookies we use for our self to enable functionality on site – often referred to as 'first party cookies' are never shared with third parties. IP addresses on webserver logs are never shared with third parties unless in response to an incident or if requested through a valid legal request.

# 4. The lawful basis for holding this information

IP addresses may be retained in other logs from our webserver. These are not shared with any third parties and held under the lawful basis of Legitimate Interest. This is because we have a legitimate interest to ensure potential cyber-attacks against our website are logged. The data is retained for 1 month unless an incident occurs in which case, we may assess a longer retention period.

# 5. When registering or logging into our website

You can complete the form on the Contact Us page of our website to share and receive information with us. When you complete this form on the website, you may supply additional information in accordance with the conditions on that page.

#### 6. Data types we collect

We may hold the additional following information categories:

- Contact Details
- Data that can identify you
- Location
- Cookies with your ID

#### 7. How and why we use the data

We hold the information you send us in order to assess how we might best assist you, and to allow you to make enquiries into our services.

# 8. Third parties who have access to your information

We will not share your information with third parties without contacting you first and asking for your written consent.

#### 9. The lawful basis for holding this information

To submit your contact details, we must set some 'first party session' cookies which could be used to identify you. These are exempt from requiring consent and are just used to enable the functionality of the website.

# Your Privacy Rights

You have rights over how we store and process your data.

# 1. You can choose not to provide us with personal data

If you choose not to provide us with personal data, you can use our website, but you will not be able to contact us and we will not be able to identify services which might be of interest to you.

# 2. You can manage your browser cookies

DCLP Consultants America Inc does not use third party cookies with the exception of Google Analytics nor cross-domain cookies that track you when you visit different websites. The cookies on our site are Non-Persistent Session (e.g. keeping you logged in during your visit to our website). You can choose to block use of cookies using your browser settings. If you choose to disable session cookies, then you will be unable to contact us via the Contact Us page. You can disable cookies used for analytics without any functional effect on your experience.

# 3. You can request that we don't use your data for marketing to you

We may also contact you about our services. If we intend to share your information with third parties, we'll let you know. You can opt-out from marketing by sending us an email to <a href="admin@dclpconsultants.com">admin@dclpconsultants.com</a>.

## 4. You have the right to access the information we hold on you

If you wish to know what information we hold on you, please email us at <a href="mailto:admin@dclpconsultants.com">admin@dclpconsultants.com</a> and within one month we will send you information we may hold on you, for example:

- The categories of data
- The reason or purpose we are using your data
- How long we plan to hold your data for
- The categories of any third parties we may disclose your data to
- Your rights on our use of your data

In some cases, there may be a conflict whereby providing your data infringes the rights and freedoms of another party, or an outstanding legal matter, which means that some of the data cannot be shared with you. In that case, we will tell you that we can't meet your request for this reason.

# 5. You have the right to object to, or restrict the processing of your data

If you don't want us to delete your data, but you wish for processing of some or all of it to be stopped, then you can request us to restrict the processing. However, this may seriously limit the services we can offer you.

# 6. Data portability

Data Portability applies when you have provided information in electronic means that is automatically processed. The functionality of our website does not include such systems.

# 7. You have the right to have all your data erased

You have the right to request that we erase all the information we have about you. Contact <a href="mailto:admin@dclpconsultants.com">admin@dclpconsultants.com</a> to find out how we can do this for you. There are sometimes limitations, for example during a legal dispute where we may be required to retain information, or where the information is still necessary in the performance of a contract that we have but if that is the case, we will let you know.

# 8. You can complain

You have a right to complain about the way we process your data to the Federal Trade Commission (FTC) by calling 1-877-ID-THEFT (1-877-438-4338) or online at <a href="https://www.ftccomplaintassistant.gov/">https://www.ftccomplaintassistant.gov/</a>. If you have a complaint, we'd like to ask if you would contact us first to see if we can resolve your concern.

# **Data Security**

The data you provide to us on this website does not get transferred outside of the United States. Our website uses encrypted communications across the entire site. Data stored on our servers are in a physically secure data center, backed up, and encrypted. All systems will have some weakness that a dedicated and skilled hacker can exploit, but we review our security measures regularly and ensure that identified risks are dealt with promptly. DCLP Consultants America Inc is registered in the state of Delaware; Company file No: 7327476 – registered office address 113 S 18<sup>th</sup> Street, Parsons, Kansas 67357.