**Future Today Retail Consultancy privacy promise**

**We care about your privacy.**

Keeping your personal information safe matters to us. We take data protection seriously because we respect the trust that you place in us to use your personal information appropriately and responsibly.

***You can be confident that:***

* We will only use personal information in ways we need to and that are expected of us.
* We will make it easy for you to tell us how you want us to communicate with you including how to opt out from future communications.
* We will not share your information with third parties for their marketing purposes
* We will keep your data safe.

It sets out how we collect the information, what we collect, how we use it, how we safeguard it, your rights under the law and in particular your rights under the General Data Protection Regulations (GDPR).

Who we are

We are Future Today Retail Consultancy (company no. 1052123)

[1](https://www.enigma-interactive.co.uk/contact)1, Queens Road, Beckenham. BR3 4JN.

simon@futuretodayretail.com

Personal data and processing – what is it?

**Personal data**means information (whether stored electronically or paper based) relating to a living individual that can be used to determine their identity.  Examples include:

* **Name, address, email address, social media posts, photos, passport, personal medical information (e.g. genetic, biometric – this is ‘sensitive personal data’, which can only be processed under strict conditions), IP addresses, bank details, National Insurance Number etc.**

**Processing**is any activity that involves use of personal data. It includes obtaining, recording or holding the data, organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.

Data protection principles - what are they?

**When we process your personal data we’ll be guided by the following principles:**

* **Lawfulness, fairness and transparency** - We’ll be open about what data processing we do, what is processed will match up with how we have described it and we shall comply with the law.
* **Purpose limitations** - We’ll only collect or obtain data for specified, explicit and legitimate purposes which can only be used for the processing purpose that we have made you aware of. If that changes, we’ll need your consent.
* **Data minimisation**- The data we collect will be adequate, relevant and limited to what is necessary.
* **Accuracy** - Our data will be accurate and where necessary, kept up to date.
* **Storage limitations** - Any personal data we keep will be kept for no longer than necessary and then removed / deleted.
* **Integrity and confidentiality** - We’ll put in place appropriate security measures to safeguard data and protect against unlawful processing or accidental loss, destruction or damage.

What data do we collect?

**We only collect what we need to as a business.**

Depending on your use of our site and the reasons you are contacting us, personal information we collect from you will include some or all of the following - y**our name, address, company name, job title, email address, IP address, date of birth, mobile or telephone number** and information regarding what **web pages** are accessed on our site.

Data may be collected in the following ways:

* when you complete our website **enquiry form, email us, phone us,** or **submit job applications**
* by means of **‘cookies’** when you use our website – please see our **Cookies Policy**
* by means of **‘web beacons’** embedded in emails – please see our **Cookies Policy**
* in the form of **‘traffic data’**

We keep a record of traffic data which is logged automatically by the server hosting our website.  This includes your IP address, the website address you visited before ours and which pages you visit on our website.  We do not store or analyse traffic data in a way that identifies any individual.

We may also collect information about you in other ways:

* during face-to-face meetings
* when you provide us with your business card
* if you are a client of ours – through our client relationship and contract
* indirectly, through one of our staff, a client of ours or a third party
* if you are a supplier of ours  - through that relationship and any contract that is in place
* via a recruitment agent - if you are put forward for a vacancy

How we use your data and our legal basis for processing your data

There are six lawful bases for processing personal data and we will always use the most appropriate bases depending on our purpose for processing and our relationship with you.

**1. Consent** - when you give clear consent for us to process your personal data for a specific purpose
**2. Contract** - the data processing is necessary for a contract that we have with you, or you have asked us to take specific steps before entering into a contract
**3. Legal obligation** - the data processing is necessary for us to comply with the law—not including contractual obligations
**4. Vital interests** - the data processing is necessary for us to protect an individual’s life
**5. Public task** - the data processing is necessary for us to perform a task in the public’s interest or for our company’s official functions, and the task or function has a clear basis in law
**6. Legitimate interests** - the data processing is necessary for our legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect your personal data that overrides those legitimate interests

**We’ll only process your information, where:**

* you have given your consent to such processing (which you may withdraw at any time)
* the processing is necessary to provide our services to you
* the processing is necessary for compliance with our legal obligations
* the processing is necessary for our legitimate interests

**Legitimate interests**

When we use the basis ‘ legitimate interests’ this means that we will process your information when we have a genuine and legitimate reason to do so but that we are not harming or infringing on any of your rights.
Using great care, we shall consider and balance any potential impact on you and your rights.

Some typical examples of when we might use the approach are for preventing fraud, direct marketing, maintaining the security of our system, data analytics, enhancing, modifying or improving our services.  We use personal data in this way to run and operate our business and planning for strategic growth.

How long do we keep your data?

We store your personal information for varying lengths depending on the purpose for which it was collected.

We will keep some records permanently, if we are legally required to do so.  We may keep some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 7 years to support HMRC audits.  In general, we will endeavour to keep data only for as long as we need it.  This means that we may delete it when it is no longer needed.

How we keep your data safe

We know how important it is to protect your personal data.

We use computer safeguards such as firewalls and data encryption and we enforce physical access controls to our offices to keep this data safe. Access to data is given to appropriate employees who need it to carry out their job responsibilities.

However, whilst we take appropriate technical and organisational measures to safeguard your personal data, please note that we cannot guarantee the security of any personal data that you transfer over the internet to us.

In regard to the services we provide, all data that we process on behalf of our clients is done under SSL and personal data will be securely stored. We take pride in ensuring all our system, client and customer data is protected and private.

How do we share and disclose information to 3rd parties?

We will never sell or share your personal information with organisations for their marketing activities.

Nor do we sell any information about your web browsing activity.

Depending on our relationship with you, we share your information with a few selected organisations we work with or on our behalf and will make sure that they also comply with the current laws and GDPR (e.g. hosting provider, payroll and pension providers).

We will not transfer your information outside the EEA. The EEA comprises certain countries within Europe (including the EU) which have similar laws on data protection. Other countries outside the EEA may not give the same level of protection to your information.

**We’re happy to answer your questions.**

Under GDPR, you have the right to ask for a copy of your personal information held by us.

If you want to know about your personal information, or privacy and data protection in general, please contact us onsimon@futuretodayretail.com

Changes to our policy

We always strive to improve our website and services so we may change and update this Privacy Policy from time to time.  We will also do so, if the law requires it.