

# UNLIMITED

## Part of Accenture Song

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UNLIMITED respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. IMPORTANT INFORMATION AND WHO WE ARE
2. THE DATA WE COLLECT ABOUT YOU
3. HOW IS YOUR PERSONAL DATA COLLECTED
4. HOW WE USE YOUR PERSONAL DATA
5. DISCLOSURES OF YOUR PERSONAL DATA
6. INTERNATIONAL TRANSFERS
7. DATA SECURITY
8. DATA RETENTION
9. YOUR LEGAL RIGHTS
10. GLOSSARY

### **1. IMPORTANT INFORMATION AND WHO WE ARE**

#### **Purpose of this privacy notice**

This privacy notice aims to give you information on how UNLIMITED collects and processes your personal data through your use of this website, including any data you may provide through this website when you contact us.

This website is not intended for children and we do not knowingly collect personal data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

#### **Data Controller**

UNLIMITED\* is the data controller and responsible for processing your personal data (collectively referred to as 'Unlimited Group', 'we', 'us', or 'our' in this privacy notice).

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

#### **Contact details**

##### **Our full details are:**

**Full name of legal entity:** See below for the subsidiary, however operating parent is Digital Unlimited Group Limited part of Accenture Song

**Name or title of DPO:** Data Protection Officer

**Postal address London:** 7 – 11 Lexington Street, London, W1F 9AF.

**Email:** [gdpo@unlimitedgroup.com](mailto:gdpo@unlimitedgroup.com)

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You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 30 May 2024

## **2. THE DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified, directly or indirectly. It does not include information from which a person cannot be identified (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, last name, maiden name, username or similar identifier, marital status, title, date of birth and gender
- Contact Data includes billing address, delivery address, email address and telephone number/s
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website
- Usage Data includes information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data), nor do we collect any information about criminal convictions or offences.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## **3. HOW IS YOUR PERSONAL DATA COLLECTED?**

We may use different methods to collect data from and about you including through:

Direct Interactions. You may give us your identity and contact data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

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- Apply for our products or services;
- Request marketing to be sent to you;
- Give us feedback

Automated technologies or interactions. As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data (including IP Address) by using cookies, server logs and other similar technologies. Please refer to our cookie policy for further details which you will find on the cookie banner when you arrive at our website.

Third parties or publicly available sources. We may receive personal data about you from various third parties as set out below:

- Technical data from analytics providers such as Google based outside the UK and EEA

#### **4. HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where it is necessary for our legitimate interests (or those of a third party) provided that your interests and fundamental rights are not overridden by those interests. We have performed a Legitimate Interests Assessment where this lawful basis applies.
- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where we need to comply with a legal or regulatory obligation

Generally, we do not rely on consent as a lawful basis for processing your personal data other than in relation to sending third-party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing or any other form of communication from us at any time by contacting us at the email address given above.

#### **Purposes for which we will use your personal data**

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences (a) Technical (b) Usage Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

#### **Cookies**

When you visit our website you will be given the option to consent to non-essential cookies using a cookie banner. Some cookies are essential to allow full access to the website and in order for it to function properly. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

#### **5. DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.

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- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. INTERNATIONAL TRANSFERS**

The majority of external data storage used by UNLIMITED is located within the UK and EEA, where possible we ensure UK or EEA data centres are used. To the extent we transfer data outside of the EEA we will ensure that the appropriate safeguards are in place e.g. where personal data is transferred to third parties in the United States, we implement an international data transfer agreement following a risk assessment.

## **7. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business requirement to access it. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. DATA RETENTION**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

In some circumstances you can ask us to delete your data: see Request erasure 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.

## **9. YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. See below to find out more about these rights:

- Request access to your personal data.

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- Request correction of your personal data.
- Request erasure of your personal data
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data (where applicable).
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us using the DPO details above.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

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 has no 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.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **10. GLOSSARY**

### **LAWFUL BASIS**

Legitimate Interest means using your data in ways you would reasonably expect where it is necessary for us to use your data without giving you full control upfront.

We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### **THIRD PARTIES**

#### Internal Third Parties

Other companies in UNLIMITED acting as joint controllers or processors and who are based in the UK and provide IT and system administration services and undertake leadership reporting.

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## External Third Parties

Service providers acting as processors based in United Kingdom or EU who provide IT and system administration services.

Professional advisors acting as processors including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.

HM Revenue and Customs, regulators and other authorities acting as processors based in the United Kingdom who require reporting of processing activities in certain circumstances.

## **YOUR LEGAL RIGHTS**

### **You have the right to:**

Request access to your personal data (commonly known as a data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it."

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. 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 (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

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.

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\*Note UNLIMITED part of Accenture Song is a group of companies of which the controller hereunder is the UNLIMITED brand website you are currently on:

**Nelson Bostock:** Nelson Bostock Group Limited (company number 2143374)

**Health:** Health Unlimited Limited (company number 3574785)

**TMW:** Tullo Marshall Warren Limited (company number 1332638)

**Walnut:** Walnut Unlimited Limited (company number 1317137)

**UNLIMITED:** Digital Unlimited Group Limited (company number 210505)