This policy covers our privacy practices in connection with our website; to let you know about the kinds of information we may obtain about you, how we may use that information, and who we might share it with.

We're not responsible for the content or privacy practices of other websites.

Each time you use our website you agree to the following terms.

# **General Statement**

We respect your right to privacy, and we're committed to complying with data protection and privacy laws. We'll only collect personal information about you with your permission. Any personal information you provide to us or we obtain about you, will be kept secure and confidential.

## **Collection and Use of Your Personal Information**

You agree that any data you provide to us will be true, complete and accurate in all respects and you agree to notify us immediately of any changes to it.

If you are aged 16 or under, you must get your parent or guardian's consent to provide your personal information to us, otherwise you are not allowed to provide any of your personal information to us.

Your personal information may be used by us, our employees, service providers and disclosed to third parties for the following purposes. For each of these purposes, we have set out the legal basis on which we use your personal information below.

Purpose	Legal Basis for use of your Personal Information
Process any applications or registrations made by you.	The performance of a contract between you and us or in order for us to take steps prior to entering into a contract with you.
To provide products, services and information requested by you.	The legal basis will fall into one of the following four categories, depending on the communication and the purpose for which it was sent: • our legitimate business interests in order for us to manage our relationship with you; • performance of a contract between you and us; • consent; and/or • compliance with legal obligations to which we are subject
To monitor and/or record communications between you and GRADY MANAGEMENT SERVICES for quality control and training purposes.	The processing is necessary for our legitimate business interests to monitor the quality of our customer services and for training purposes.
To administer your account and provide our customer services.	This processing will be necessary our legitimate business interests in order for us to manage our relationship with you; or the performance of a contract between you and us.
To manage complaints, feedback and queries	This processing will be necessary for the performance of our contractual obligations between you and us to comply with our legal and regulatory obligations; and/or our legitimate business interests in order for us to manage our relationship with you and to enable us to improve and develop our business operations and the services.
To carry out our obligations arising from any contracts entered into between you and us and to provide you with the products and services requested	The processing is necessary for the performance of our contract with you.
To enforce or apply the contracts concerning you (including contracts between you and us).	The processing is carried out for our legitimate business interests in order to conduct and manage our business; for the performance of a contract between you and us; or in connection with legal proceedings (i.e. the establishment, exercise or defence of legal claims).

We may be required to obtain your personal information to comply with our legal requirements, to enable us to fulfil the terms of our contract with you or in preparation of us entering into a contract with you. If you do not provide the relevant personal information to us, we may not be able to provide the service to you.

## **Retention of data**

We'll keep your personal information for as long as necessary for the purposes for which it was collected, to provide you with services and to conduct our legitimate business interests or where otherwise required by law. If you use 'Grady Management Services', we may hold your Communications Data for 12 months for legitimate business purposes (or longer in connection with any legal proceedings or disputes).

#### Disclosure

Your personal information may also be processed by other organisations on our behalf for the purpose of processing applications, and providing information or services to you.

We may also disclose your information for the prevention and detection of crime and to protect our interests and other users or if required to do so by law.

We may also disclose your personal information to other third parties, for example:

- if we are under a duty to disclose or share your personal information in order to comply with any legal obligation,
- or in order to enforce or apply the agreements concerning you (including agreements between you and us).

#### **Your Rights**

You have certain rights with respect to your personal information. The rights may only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights. You can exercise these rights using the contact details below

#### Summary of your rights

Right of access to your personal information	You have the right to receive a copy of your personal information that we hold about you, subject to certain exemptions. Please contact the Data Protection and Privacy Officer, Grady Management Services Ltd, Lowes Road, Bury, BL9 6PJ
Right to rectify your personal information	You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete
Right to erasure of your personal information	You have the right to ask that your personal information be deleted in certain circumstances. For example (i) where your personal information is no longer necessary in relation to the purposes for which they were collected or otherwise used; (ii) if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal information; (iii) if you object to the use of your personal information (as set out below); (iv) if we have used your personal information unlawfully; or (v) if your personal information needs to be erased to comply with a legal obligation.
Right to complain to the relevant data protection authority	You have the right to complain to the relevant data protection authority, which is, in the case of Grady Management Services Ltd, the Information Commissioner's Office, where you think we have not used your personal information in accordance with data protection law.

# Other terms and conditions

# Notification of changes

If we change this Privacy Policy we will post the amended Policy on our website so that you are always aware of how we collect, use and disclose your personal information.

Access to your personal information. (Subject Access Request)

You have the right to obtain a copy of the personal data which we may hold about you. Please write to the Data Protection and Privacy Officer Grady Management Services Ltd. GMS House Lowes Road Bury BL9 GPJ Alternatively email: info@gradymanagement.co.uk

We may ask you to provide proof of your identity and residence and may charge £10 to cover our administrative costs.

## **Monitoring of Your Communications**

We may monitor and/or record communications between you and Grady Management Services Ltd for quality control and training purposes.