## **Privacy Notice**

The following information is provided to comply with the requirements of the General Data Protection Regulation.

This privacy statement describes why and how we collect and use personal data and provides information about individuals' rights. It applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for any of the purposes described in this privacy statement or as otherwise stated at the point of collection.

Identity and contact details of the controller and where applicable, the controller's representative and the data protection officer	Where an insolvency practitioner of Path Business Recovery Limited is not appointed as office holder, the data controller is the company/individual on whose instructions he is acting. For contact details, please contact Gareth Howarth of Path Business Recovery Limited on 0161 413 0999 confidential@pathbr.co.uk.  Where an insolvency practitioner of Path Business Recovery Limited is appointed as office holder and the data processing is carried out as part of their statutory duties, the office holder(s) is/are the data controllers. However, where they are processing data on behalf the company/individual over which they have been appointed, then the data controller is that company/individual.
How we use your personal information	The purpose for which personal information is processed may include any or all of the following:  • deliver services and meet legal responsibilities  • verify identity where this is required  • communication by post, email or telephone  • understand needs and how they may be met  • maintain records  • process financial transactions  • prevent and detect crime, fraud or corruption  • may also need to use data to defend or take legal actions related to the above
Lawful basis for the processing	To comply with our legal obligations under statute and other regulatory obligations related to the insolvency process. We also believe you have a legitimate interest in the information being supplied.
What personal information we hold	The categories are: contact details, financial information and location.
Who we share our data with	Personal data held by us may be transferred to:
data with	Third party organisations that provide applications/functionality, data processing or IT services to us  We use third parties to support us in providing our services and to help provide, run and manage our internal IT systems. For example, providers of information technology, cloud based software as a service providers, identity management, website hosting and management, data

analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centres around the world, and personal data may be stored in any one of them.

Third party organisations that otherwise assist us in providing goods, services or information

Auditors and other professional advisers

Law enforcement or other government and regulatory agencies or to other third parties as required by, and in accordance with, applicable law or regulation

Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

## **Cookies**

We use a number of different cookies on our site. If you do not know what cookies are, or how to control or delete them, then we recommend you visit <a href="http://www.aboutcookies.org">http://www.aboutcookies.org</a> for detailed guidance.

The list below describe the cookies we use on this site and what we use them for. Currently we operate an 'implied consent' policy which means that we assume you are happy with this usage. If you are not happy, then you should either not use this site, or you should delete the cookies having visited the site, or you should browse the site using your browser's anonymous usage setting (called "Incognito" in Chrome, "InPrivate" for Internet Explorer, "Private Browsing" in Firefox and Safari etc.)

## FIRST PARTY COOKIES

These are cookies that are set by this website directly.

Google Analytics: We use Google Analytics to collect information about visitor behaviour on our website. Google Analytics stores information about what pages you visit, how long you are on the site, how you got here and what you click on. This Analytics data is collected via a JavaScript tag in the pages of our site and is not tied to personally identifiable information. We therefore do not collect or store your personal information (e.g. your name or address) so this information cannot be used to identify who you are.

You can find out more about Google's position on privacy as regards its analytics service

at <a href="http://www.google.com/intl/en uk/analytics/privacyoverview.html">http://www.google.com/intl/en uk/analytics/privacyoverview.html</a>

**WordPress:** Our websites runs the popular WordPress CMS and cookies are used to store basic data on your interactions with WordPress, and whether you have logged into WordPress. We use

	a <b>session cookie</b> to remember your log-in for you if you are a registered user and we deem these as being strictly necessary to the working of the website. If these are disabled then various functionality on the site will be broken.
	More information on session cookies and what they are used for at <a href="http://www.allaboutcookies.org/cookies/session-cookies-used-for.html">http://www.allaboutcookies.org/cookies/session-cookies-used-for.html</a>
How long we retain your personal information	We retain personal data for as long as is necessary to achieve the purpose listed above and for any other permissible related purpose. For example, we retain most records until the time limit for claims arising from the activities has expired or otherwise to comply with statutory or regulatory requirements regarding the retention of such records.
Your rights	The GDPR provides the following rights for individuals:
	Right to inform This privacy notice meets our requirement to inform you of our processing of your data.
	Access to personal data You have a right of access to personal data held by us as a data controller. This right may be exercised by contacting us [insert contact information]. We will aim to respond to any requests for information promptly, and in any event within one month.
	Amendment of personal data To update personal data submitted to us, you may email us confidential@pathbr.co.uk or, where appropriate, contact us via the relevant website registration page or by amending the personal details held on relevant applications with which you registered.
	Rights that do not apply in these particular circumstances Not all of the rights under the GDPR are available as one of the reasons we are holding your data is on the basis of it being a legal obligation and therefore the right to erasure, data portability and to object do not apply.
Right to withdraw consent	The data received was not based upon obtaining consent and therefore the right to withdraw consent does not apply.
Changes to our privacy statement	We keep this privacy statement under regular review and will place any updates on our website. Paper copies of the privacy statement may also be obtained by writing to us at 64 Jersey Street, Manchester, M4 6JW.
Complaints	This privacy statement was last updated on 23 May 2018.  Should you want to complain about our use of personal data, please contact us at Path Business Recovery Limited, Flint Glass Works, 64 Jersey Street, Manchester, M4 6JW, Telephone: 0161 413 0999, Email: confidential@pathbr.co.uk.
	You also have the right to lodge a complaint with the Information Commissioner's Office ("ICO") (the UK data protection regulator). For

	further information on your rights and how to complain to the ICO, please refer to the ICO website.
Who provided the personal data	The personal data we have used to contact you was provided by the company/individual (or persons acting on their behalf) on whose instructions we are acting or in relation to which our insolvency practitioner has been appointed. We also access information from the Registrar of Companies and other similar public-access data providers.

## Path Business Recovery