



Privacy Policy for External and Third Parties

Document Number:	004_3_4_01_GD02
Prepared By:	RT
Approved By:	BC
Data Classification:	Confidential : Internal
Revision/Version:	1.04

Date: 17/10/2024

Document Revision History

Rev. No.	By	App'd	Description	Date
1.01	RT	BC	Annual Review; Document reformatted to C&C standard; New version numbering system implemented;	12/01/2022
1.02	AS	WL	Annual Review; Updated point of contact from Rebecca Taylor to Ashley Scott	02/12/2022
1.03	AS	WL	Annual Review; Updated point of contact from Rebecca Taylor to Ashley Scott	30/11/2023
1.04	AS	WL	Annual review, no revisions;	17/10/2024

Cousins & Cousins Privacy Policy – external and third parties

Cousins & Cousins is committed to protecting the personal information of our visitors to our studio and website, clients –current and future, suppliers and contractors.

This privacy statement provides information about the personal information that Cousins & Cousins collects about all external and third parties such as visitors to our studio and website, clients –current and future, suppliers and contractors, and the ways in which our practice uses that personal information.

Any questions regarding this Policy and our privacy practices should be sent by email to info@cousinsandcousins.com or by writing to Ashley Scott, Cousins & Cousins, Bedford House, 125-133 Camden High Street, London NW1 7JR.

How do we collect information from you?

Our website

You can visit our website without providing any personal information, however we may automatically collect IP addresses, information about your visit and how you use our website.

You may provide us with information by corresponding with us by phone, email, or otherwise as indicated on the website.

Visiting our Studio

Meetings

When you visit our studio, you will be asked to provide your name and the company you work for. This information is held for safety reasons so we know who is in the building at any one time.

Visitor records are held for 12 months. The purpose of holding this information is to enable our internal teams to analyse the use of the space and ensure the facilities remain appropriate and relevant.

Events

If you are visiting for an event which is being held in our studio you will be asked for your name and the company you work for. You may also be provided with a name badge, if appropriate for the event.

There is a high chance that there will be photographers at the event and if that is the case you will have been informed beforehand and your consent sought for your photograph to be taken.

If this is the case, photography may be used on our social media sites and publications.

What type of information is collected from you?

The personal information you provide may include your name, company address, e-mail address, phone number and other information about yourself to enable us to provide you with our services.

How is your information used?

When we collect personal information from our clients and other members of the public, it will be used for the following purposes:

- To maintain responsible commercial relations with you
- To understand your service and/or project needs
- To manage and develop our business and operations
- To meet legal and regulatory requirements
- To notify you of changes to our services
- To process a job application if appropriate
- To recommend your product or service to relevant contacts within the industry

We are legally required to hold some types of information to fulfil our statutory obligations. We will hold your personal information on our systems for as long as is necessary for the relevant activity.

When you voluntarily give us your personal information, we will only use it for the above purposes. If we intend to use your personal information for a purpose other than those above, we will seek your express consent.

Who will it be shared with?

We will not share your information with third parties for any reason other than those specified above.

Your rights

You have the right to ask us not to process your personal information. You can exercise your right by checking or unchecking certain boxes on the forms we use to collect your data. Or you can exercise the right by contacting us at info@cousinsandcousins.com or by writing to Ashley Scott, Cousins & Cousins, Bedford House, 125-133 Camden High Street, London NW1 7JR.

Our website contains links to a number of websites that may offer useful information to our visitors. Please note, that if you follow the link to any of these websites this privacy statement does not apply, and we do not accept responsibility or liability for their policies.

You also have the right to see and correct data that we hold about you. If your details change or any other information we hold is inaccurate or out of date, please let your direct contact at Cousins & Cousins know or email us at info@cousinsandcousins.com.

Security

Cousins & Cousins will take reasonable technical and organisational precautions to ensure that your personal information it's treated securely. We will store all personal information you provide on our secure servers.

We use a least privilege access to data approach, restricting access to only those who need to so they can discharge their duties.

In addition, we have deployed a number of systems to ensure your data remains safe, these include:

- An incident detection, response and user behaviour analytic system running looking for unusual data access or user behaviour.
- Carry out vulnerability testing on all desktops to ensure that no known issues exist that would allow applications to be hijacked.
- A program of monthly patch management, this ensures desktops and servers stay up to date with latest security patches.
- Carrying out regular phishing testing, to ensure users are aware of the dangers of phishing emails, part of this testing includes training.
- We use firewalls to protect our network borders, to stop our data being breached.
- All desktops run antivirus and anti-ransomware software.
- Taking regular backups

WI-FI

We provide access to the internet while you are in the studio, it is securely configured to separate our corporate data from internet browsing. As a guest you will be asked to logon to a secure portal that will grant you access to browse the internet only. We do not store any information about your connection or the sites you visit.

16 or Under

We do not collect any personally identifiable information from children aged 16 or under without prior verifiable consent from his/her parent/guardian.

Data Breaches and reporting

If it becomes apparent that a potential data breach has occurred, the Company will endeavour to report this to the ICO within 72 hours of becoming aware of the data breach. This will be the case if the data breach is likely to result in damage to a person's reputation, financial loss, loss of confidentiality, or major financial or social disadvantage. If the breach is likely to result in a high risk to the rights and freedoms of the data subject the Company will also contact the data subject without undue delay.

Data breaches will be reported to the Information Commissioner Office (ICO) by calling the dedicated personal data breach helpline on 0303 123 1113.