

MCD Compliance



LEGAL, SECURITY & DATA
PROTECTION CONSULTANTS

WEBSITE PRIVACY STATEMENT

**LAST UPDATED: JANUARY 2021
VERSION: 2.1**

NOT PROTECTIVELY MARKED

COPYRIGHT © 2020 MCD COMPLIANCE. ALL RIGHTS RESERVED

MCD Compliance (“MCD”, “Company”, “We”, “Us”, or “Our”) respects your privacy and believes in transparency in respect to Your Personal Information. For that reason, we have outlined what we collect, what we do with the information that is collected, how we may disclose information and how long we retain such information. By continuing to visit websites MCD Compliance’s website, you confirm that you have agreed to our Terms & Conditions and have read & understood this privacy statement.

1.0 – SCOPE

Websites (<https://mcdcompliance.co.uk>) and Contact mechanisms provided by MCD Compliance

2.0 – HOW THIS POLICY IS APPLICABLE

This privacy policy describes what we do with all the information that we collect and use for our own purposes (where we are a controller), about how you use and interact with our websites.

3.0 - INFORMATION WE COLLECT

Information from your use of our websites. This includes: Internet Protocol addresses, information about your browser, network and device (such as browser type and version, operating system, internet service provider, preference settings, and language and timestamps.

4.0 – HOW WE COLLECT INFORMATION

We obtain information automatically when you visit our Sites, through the use of technologies which include may include cookies or analytics systems or information you provide through our website or our contact mechanisms.

We have described this in more detail below:

4.2 – INFORMATION YOU PROVIDE

Sometimes we require you to provide us with information for contractual or legal reasons. For example, we may ask you to select your jurisdiction when you visit our websites to determine if you are visiting the site most local or appropriate to you. We’ll normally let you know when information is required, and any consequences (if any) of failing to provide it. If you do not provide necessary information when requested, you may not be able to use our websites or Services if that information is necessary to provide you with the service or if we are legally required to collect it.

4.2 – INFORMATION OBTAINED FROM YOUR USE OF OUR SITES

When you visit our websites, we collect anonymised information about your activity on and interaction with the website, such as your IP address(es), basic device and browser information, which pages on our Site you visit and for how long. None of this information however is personally identifiable, as it is either in anonymous, aggregated or pseudonymised

NOT PROTECTIVELY MARKED

form which does not focus on you individually but all visitors or users as a whole. We use this data to evaluate, provide, protect or improve our websites and Services.

We let our users control what cookies and similar technologies are used through their sites (except those we need to use to provide the websites with properly, such as for performance or security related reasons. Some of this information is similarly collected automatically through your browser or from your device.

5.0 – HOW COLLECTED INFORMATION IS USED

We use the information we obtain about you to ensure or otherwise conduct the following:

- Communications & Enquiries
- Ensuring the integrity, reliability and security of MCD Compliance websites
- Policy or Law Enforcement

We process information for the above purposes, when:

- Consent: You have consented to the use of your personal information in a legal way.
- Legitimate Interests We have a legitimate interest in using anonymised information only. We have a legitimate interest in the following cases: To analyse and improve the safety and security of our websites - we do this as it is necessary to pursue our legitimate interests in ensuring our websites, services and infrastructure are secure, such as by implementing and enhancing security measures and protections and protecting against fraud, spam and abuse.
- To anonymise and subsequently use depersonalised information from use of our websites
- To provide and improve the websites, including any personalised or tailored services: We do this as it is necessary to pursue our legitimate interests of providing an innovative and tailored offering to our users on a sustained basis
- Legal Obligation: We have a legal obligation to use your personal information, such as to comply with applicable tax and other government regulations or to comply with court orders, national security notices or any other legally binding law enforcement requests.

6.0 – DISCLOSURE OF INFORMATION

Disclosure of any information, both personally identifiable and non-personally identifiable information, is heavily questioned and assessed throughout MCD. All information is treated in the strictest confidence and we never share or sell your information for any reason other than the purposes listed in this our privacy policies and statements. On occasion, your information may be disclosed in the following ways:

- Business Partners: We may on occasion disclose non-user, analytical data for reasons limited to the interests of the company or any incidents that have occurred involving Company Property or websites etc.
- Third Parties: There has never and will never be intentional disclosures or selling of any customer information or data.
- Following the law, or protecting rights and interests: We may disclose some of your information - if we determine that such disclosure is reasonably necessary to comply with the law, protect our or others' rights, property or interests (such as enforcing our Terms of Service & other legally binding agreements) or to prevent fraud or abuse of our sites.

NOT PROTECTIVELY MARKED

- Service Providers: We indirectly share information with our service providers that perform or provision services on our behalf (i.e. Internet Service Provider.)
- Statistics: We may publicly release anonymised facts and figures about web visitors as part of promotions or other viable reasons
- Business Transfers: If we're involved in a reorganisation, merger, acquisition or sale of some or all our assets and your information may be transferred as part of that deal.

7.0 - HOW WE PROTECT AND HOW LONG IT IS RETAINED

We are dedicated to keeping all information safe. We maintain stringent administrative, technical and physical safeguards that are intended to appropriately protect against accidental or unlawful destruction, accidental loss, unauthorised alteration, unauthorised disclosure or access, misuse and any other unlawful form of processing of, the information in our possession. We employ security measures such as using firewalls to protect against intruders, building redundancies throughout our network (so that if one server goes down, another can cover for it) and testing for and protecting against network vulnerabilities. Furthermore, all our infrastructure is enclosed in secure racks in our service provider's data centre. We collect and maintain aggregated, anonymised or de-personalised information which we retain indefinitely in our Analytics and Data Archival Systems. All personal information collected (i.e. message exchanges or contact information etc.) are deleted from our systems and databases when no longer needed or at the request of the data subject – whichever is sooner.

8.0 – DATA SUBJECT RIGHTS

As a Data Subject, you have a number of rights. You have the right to the following:

- Right to know: You have the right to know what personal information is collected, used, shared or sold. We outline both the categories and specific bits of data we collect, as well as how they are used, in this privacy statement
- Right of access: Obtain a copy of all the data we hold about you, upon request
- Right to rectification: Request the Company to change or update incorrect or incomplete data
- Right to erasure: Request the Company to delete or stop processing your data
- Right to object: Object to the processing of your data
- Right to not be subject to automated decision-making

To exercise any of your rights, please email: legal@mcdcompliance.co.uk at your earliest convenience.

9.0 – DATA SOVERIGNTY & INFORMATION PROTECTION

All data that is held and processed by MCD Compliance is done solely in the United Kingdom, unless the Customer is situated outside the UK, in which data shall be transferred to their respective country or jurisdiction. We are dedicated to keeping personal information safe. We maintain stringent administrative, technical and physical safeguards that are intended to appropriately protect against accidental or unlawful destruction, accidental loss, unauthorised alteration, unauthorised disclosure or access, misuse and any other unlawful form of processing of, the personal information in our possession. We employ security measures such as using sophisticated firewalls to protect against intruders, building redundancies throughout our network (so that if one node goes down, another can cover for

NOT PROTECTIVELY MARKED

it where possible) and testing for and protecting against vulnerabilities. Furthermore, all our infrastructure is enclosed in secure racks and Tier 3 ISO-accredited data centres around the United Kingdom to ensure availability and resilience.

10.0 - COOKIES

To enrich and perfect your online experience whilst using our sites and services, MCD Compliance uses "Cookies", similar technologies and services to display personalised content and to store your preferences on your computer. A cookie is a string of information that a website stores on a visitor's device, and that the visitor's browser provides to the website each time the visitor returns. MCD Compliance uses cookies to help us identify and track visitors, their usage of our websites, and their website access preferences. MCD Compliance visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using our websites or hard opt-out of any of our analytics/tracking systems, with the drawback that certain features of our websites may not function properly without the aid of cookies. At the present, we don't serve advertisements. Cookies that We operate are solely strictly necessary, as they pertain to the fundamental operation of our sites.

11.0 – DATA PROTECTION COMPLAINTS

For all complaints regarding data protection, please in the first instance contact us directly, at: legal@mcdcompliance.co.uk. If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners Office on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.

12.0 – CHANGES TO THIS PRIVACY STATEMENT

This privacy policy will be updated from time to time, so when we deem it appropriate/necessary for affiliates and web visitors will be notified accordingly. We recommend that you return periodically to see if any changes have occurred as both major/minor changes may occur unannounced.

NOT PROTECTIVELY MARKED

COPYRIGHT © 2020 MCD COMPLIANCE. ALL RIGHTS RESERVED