

Privacy Policy

1st September 2024

INTRODUCTION

This is the privacy policy for Tarsh Consulting and the Tarsh Consulting website.

Privacy Policy dated 1st October 2021

This privacy policy:

- adheres to international standards on data protection; and
- shows to our clients, suppliers and users that we have a consistent approach to data privacy across Tarsh Consulting's business and its website.

IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy policy

This privacy policy aims to give you information on how Tarsh Consulting collects and processes your personal data through your use of the Tarsh Consulting website and platform. The Tarsh Consulting website/platform may be amended from time to time.

Tarsh Consulting Ltd is a private limited company, no. 4242106. Its registered address is 12 Stonor Road, London W14 8RZ, UK.

The Tarsh Consulting website/platform is not designed to appeal to children.

It is important that you read this privacy policy together with the Tarsh Consulting [Terms of Use Policy](#), Tarsh Consulting [Cookies Policy](#), and the relevant terms and conditions of use for the Tarsh Consulting website you are visiting.

Data Controller

This privacy policy is issued on behalf of Tarsh Consulting so when we mention “we”, “us” or “our” in this privacy policy, we are referring to the relevant company responsible for processing your data.

The Tarsh Consulting website and its respective data controller are as follows:

<i>Controller:</i>	<i>Website:</i>
Tarsh Consulting	www.Tarsh.com

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

CONTACT DETAILS

Postal address:

Data Protection

Tarsh Consulting

12 Stonor Road, London, W14 8RZ

Email: Magnus.Rainmaker@Tarsh.com

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

THIRD-PARTY LINKS

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Tarsh Consulting website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookies Policy.

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 need to know. They will only process your personal data in a manner agreed by us; and they are subject to a duty of confidentiality and/or maintenance of high standards of data security.

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.

DATA USE

What, how and why we collect personal data is described more fully below.

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, regulatory 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 on request by contacting us, at the email/postal address above.

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.

YOUR LEGAL RIGHTS

You have rights under data protection laws in relation to your personal data, including:

- requesting access to your personal data.
- requesting the correction of your personal data.
- requesting erasure of your personal data.
- objecting to processing of your personal data.
- requesting restriction on processing your personal data.
- requesting transfer of your personal data.
- the right to withdraw consent previously given.

If you wish to exercise any of the rights set out above, please email Magnus.Rainmaker@Tarsh.com.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise similar 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.

If we need something from you to be able to deal with your request (eg: proof of identity), the time limit will begin once it has been received. If your request is complex or you make more than one, the response time may be up to three months from the date of receipt.

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. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. Consent must be withdrawn in writing and appropriate ID verification processes may be required to validate the veracity of the withdrawal request. A record of the withdrawal may be kept.

GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in giving you the best service/product and the best and most secure experience. 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 by emailing Magnus.Rainmaker@Tarsh.com.

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 to which we are subject.

THIRD PARTIES

External Third Parties means government bodies, individuals or other organisations that may need to process your personal data, acting as either a data processor, or joint data controller. For example:

- Governmental authorities, such as border control, immigration and health authorities
- Event and venue operators such as, but not limited to, conference and exhibition centres, theme parks, stadia, theatres, hotels and restaurants
- Travel providers such as, but not limited to, airlines, airports, cruise ships, ferries, railways, coach and taxi operators and ski lift operators
- Service providers acting as data processors, and based within the European Economic Area who host some or all of the Tarsh Consulting website and provide IT and system administration services
- Professional advisers acting as processors or joint controllers including, but not limited to, lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance accounting and other services
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances
- Medical/market research and customer insight organisations, acting as joint data controllers

What personal data we collect

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

- **Identity Data (ID)** includes your first name, last name, username, e-mail address and passport or identity card number.
- **Commercial Role Data (CRD)** includes job title, organisation name, organisation address, information relating to which sector your organisation is in.

- **Financial Data (FD)** includes bank account and payment card details should you chose to pay for TARSH CONSULTING's services.
- **Transaction Data (TrD)** means details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data (TD)** may include 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 the Tarsh Consulting website, how often and for how long you access the Tarsh Consulting website.
- **Marketing and Communications Data (MCD)** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect and use aggregated data such as statistical or demographic data for Tarsh Consulting's legitimate business purposes. 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 policy.

Data sharing

We may share your data with External Third Parties in order to facilitate travel, facilitate access to events and venues, tackle the spread of disease and comply with lawful requests from government, judicial, regulatory, health or other similar authorities.

Purposes for which we will use your personal data

We have set out below, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground on which we are relying to process your personal data, where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
Facilitating travel, accessing events and venues, tackling the spread of disease and sharing data with third parties for such purposes	<ul style="list-style-type: none"> · Identity Data · Marketing and Communications Data · Transaction Data · Technical Data 	<p>Contract (where the user is an individual and is a direct or indirect contracting party through the website or through a third party's website/platform)</p> <p>Legitimate interest (where the user is an individual and is a direct or indirect contracting party through the website or through a third party's website/platform)</p>
Registering as a new user and operating the Tarsh Consulting system	<ul style="list-style-type: none"> · Identity Data · Commercial Role Data · Marketing and Communications Data 	<p>Contract (where the user is an individual and is a contracting party through the website terms of use or a user end licence agreement): to fulfil obligations under the contract including providing access to the website/tool.</p> <p>Legitimate interest (where the user is an individual or a representative of a customer-organisation): to allow the user or the customer's designated users to access the website/tool</p>
To communicate new features and fixes to the website to the user	<ul style="list-style-type: none"> · Identity Data 	<p>Legitimate interest (where the user is a representative of a customer-organisation): explain to designated users of the customer what the new features and bug fixes are for the website/tool.</p> <p>Contract (where the user is an individual and is a contracting party through the website terms of use or a user end licence agreement): to explain to the customer what the new features and bug fixes are for the website/tool.</p>
To administer, operate and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting	<ul style="list-style-type: none"> · Identity Data · Technical Data 	<p>Legitimate Interest/Contract (where the user is referred to as "you" under the website terms of use): to deliver, optimise, maintain, and protect the website's integrity for the benefit of each user.</p>

and hosting of data)		
To allow users to purchase products or services and use/consume them	<ul style="list-style-type: none"> · Identity Data · Commercial Role Data · Financial Data · Transaction Data 	<p>Contract (where the person making the purchase is the customer): to create a purchase history, facilitate transactions made “on paper” and fulfil contractual obligations more generally. Online payments may be made through “Stripe”, the third party payment processing platform.</p> <p>Legitimate Interest (where the person making the purchase is doing so on behalf of an organisation): to create a purchase history, facilitate transactions made and to create a record of customer users.</p>
Share information with service providers	<ul style="list-style-type: none"> · Identity Data · Commercial Role Data · Marketing and Communications Data 	<p>Legitimate interest: TARSH CONSULTING operating the given website may need to pass on the user’s or customer’s personal data to the authorities or to corporate customers to contact them in the event of any potential malfunctioning or suspicious use of the Tarsh Consulting system</p>
To anonymise and create case-studies for statistical and operational purposes or research and development	<ul style="list-style-type: none"> · Identity Data · Commercial Role Data · Transaction Data · Technical Data 	<p>Legitimate interest: any personal data is anonymised to be used for statistical purposes to create statistical reports and case studies and for research and development.</p>
To facilitate communications between the various parties that use the tool; being a function of the website/tool	<ul style="list-style-type: none"> · Identity Data · Commercial Role Data 	<p>Contract (where the user is subject to website terms of use or an end user licence): the website/tool is collaborative and requires different parties to upload content and communicate with each other and the company data controller.</p> <p>Legitimate interest (where the user is designated by the customer to use the website/tool): the website/tool is collaborative and requires different parties to upload content and communicate with each other and the company data controller.</p>