

PRIVACY POLICY

Introduction

CNSTRCT Consulting LLC. (referred to below as “we”, “us” or “our”) takes the privacy of your personal data very seriously. This Privacy Policy sets out the basis on which we will process personal data that we collect when you use our website at <https://www.cnstrctusa.com> (the “Site”), or otherwise in connection with our professional practice. Please read it carefully.

For further details about us, see the contact us section at the end of this Privacy Policy. For the purposes of the applicable Data Protection legislation, we may be a data controller in respect of any personal data that we collect from or about you, whether you are, or you are acting on behalf of, a client or potential client, or a professional or business contact, or if you are a job applicant.

Personal Data We Collect

If you wish to contact us about our professional practice (either through the Site or by phone, email or post), or become a client of the firm (or represent such a client), we ask you to supply essential contact details (your name, e-mail address, phone number, and country of residence, and (where applicable) the company you represent and your job title), which we need in order (if you instruct us, or the entity you represent does so) to perform the contract that we have with you (or the entity you represent) to identify you, as well as the firm’s professional services which may be of interest to you.

If you wish to become a client (or the entity you represent wishes to become a client) and, if you do so (or the entity you represent does so), in the course of providing our professional services, we may collect further personal information from you.

We may also need to ask you to provide personal information, and we will carry out background checks about you with credit reference agencies and fraud prevention agencies, for credit control purposes and in order to satisfy our obligations under applicable legislation. If you do not provide the information we require, we will not be able to provide our professional services for you or the entity you represent.

How We Use Your Personal Data

When you make an enquiry, we will process the personal data that you give us, or we collect from you, so that we can supply you with the information you request, on the basis that it is necessary for our legitimate interests in promoting and marketing our professional services and, if you instruct us (or the entity you represent does so), to perform the contract that we have with you (or the entity you represent).

We will also process your personal data for internal record keeping, billing and accounting, and to respond to any queries, complaints or requests for further information, on the basis that it is necessary for our performance of the contract we have with you, or it is necessary for our legitimate interests in managing our business and improving our professional services.

We also use the personal data that you provide or that we collect for market research purposes and to improve the content or lay-out of the Site, on the basis that it is necessary for our

legitimate interest in promoting and marketing our goods and services, managing the Site and providing a better service for our customers, on the basis that it is necessary for our legitimate interests in promoting and marketing our professional services.

We may use collected information to enhance the visitor experience of the Site or professional services we may offer to you in the future (the “Service”), to operate and maintain the Site, to investigate and understand how our Service is used, to monitor and protect the security and integrity of the Site or the Service, and to otherwise analyze our business.

We analyze traffic to the Site in various ways, including using a service called Google Analytics. We use this information to generate statistics and to measure activity to improve the usefulness of the Site and the Service. Google Analytics is subject to the privacy policy of Google. By visiting the Site or using the Service, you are agreeing to the terms of the Google Privacy Policy that apply to Google Analytics. These terms can be found at “How Google uses data when you use our partners’ sites or apps”, located at <https://www.google.com/policies/privacy/partners/> or any other URL Google may provide from time to time. We are not responsible for any changes made to the Google Privacy Policy or of advising you of such changes. We reserve the right to change analytical service providers at any time without notice.

We may use the personal data that we collect from you to contact you by email with marketing information about services that are the same as or similar to those you have enquired about or ordered, unless you tick the relevant box situated on the form on which we collect your data. You can always opt-out of receiving marketing emails from us. All future marketing communications will also contain a simple way to opt out of receiving such further communications from us.

We may also contact you by email with marketing information about other goods and services we feel may interest you, on the basis that it is necessary for our legitimate interests in promoting and marketing our professional services, provided that you consent to receiving such emails by ticking the relevant box situated on the form on which we collect your data. You can always opt-out of receiving marketing emails from us. All future marketing communications will also contain a simple way to opt out of receiving such further communications from us.

If you provide us (or one of our employees or other personnel) with your professional or business contact details or other relevant personal data, we will use this in order to keep in touch with you and exchange information that we believe is, or may become, relevant to our and your business or profession, on the basis that it is necessary for our legitimate interests in promoting and marketing our professional services.

If you submit a job application or enquire about a potential position with a Group member, or another person does so on your behalf, we will ask you (or them) to provide relevant personal information about you. Further details of the personal data that we collect, and of the basis on which we will process your personal data, will be provided by our HR Department at the time.

Your personal data will not be used for any other purpose, or disclosed to any third party, unless we are required to do so by law, or as mentioned in the next paragraph.

Who We Share Your Information With

When we provide some of the services we may do so with the assistance of third party suppliers, who will need to have access to your personal data for that purpose. Such third party suppliers will be appointed on the basis that they provide sufficient guarantees to implement appropriate technical and organizational measures so that the processing will carry out processing only on our written instructions, ensure the protection of the rights of data subjects, and otherwise meet the requirements of the applicable Data Protection legislation.

We may disclose your personal data if it is necessary for us to do so in order to comply with any legal or regulatory obligation, or where we have a legitimate interests in doing so, such as in order to enforce or apply our contract with you, to investigate potential breaches, or to protect our property and rights or those of others. This may include exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

External organizations may conduct audit or quality checks for us. These external organizations are required to maintain confidentiality in relation to your files. If you do not want your file to be part of this process, please tell us as soon as possible.

If another company acquires substantially all of our business or assets, that company will possess the same information and will assume the rights and obligations with respect to that information, and any transfer of your personal data will be made on the basis that it is necessary for our legitimate interests in transferring our business or assets.

Except as set out above or in accordance with the operation of law or lawful demand, we will never sell, distribute or disclose any of your personal data (except anonymous aggregate information) with any third party without your express consent.

How Long We Keep Personal Data

We normally retain contract information (including personal data) for a reasonable period after the end of the relevant contract, or for longer where we believe it is necessary for us to do so for the establishment, exercise or defense of legal claims or for compliance with legal obligations.

Personal data relating to our professional contacts will be retained for so long as is necessary, or until you indicate otherwise to us, but we will aim to update our contacts' preferences on a periodic basis.

In certain cases, it may not be physically possible to delete certain data (for instance, where it is stored on a secure external server), in which case we will take appropriate steps to ensure that it is not available for re-use or disclosure to third parties.

Your Rights

As a data subject, you have certain legal rights subject to certain exceptions under the applicable Data Protection legislation) including:

- the right to access the personal data held about you;
- the right to ask us not to process your personal data for marketing purposes;
- the right to withdraw at any time any consent you have given to receive marketing material from us, or in any other case where we process your personal data on the basis of a consent that you have given (and not on some other legal basis);

- the right to ask us to rectify inaccurate personal data about you;
- the right to ask for the restriction of personal data concerning yourself that is inaccurate, unlawfully processed, or no longer required;
- the right to ask for the transfer of your personal data in a structured, commonly used and machine readable format where the processing is based on your consent;
- the right to ask for the erasure of personal data concerning yourself where processing is no longer necessary, or the legitimate interests we have in processing your personal data are overridden by your interests, rights and freedoms as the data subject;
- and the right to make a complaint to the Information Commissioner's Office.

Security

We follow generally accepted industry standards to protect the personal data submitted to us, both during transmission and once we receive it. However, no method of transmission over the internet or via other devices is 100% secure. We will take reasonable steps so that your Information is treated securely and in accordance with this Privacy Policy, but we cannot take responsibility for any unauthorized access or loss of personal data that is beyond our control.

Cookies

A cookie is a small file of letters and numbers that we put on your computer if you agree. These cookies allow us to distinguish you from other users of our Site, which helps us to provide you with a good experience when you browse our Site and also allows us to improve our site.

The cookies we use on the Site allow us to recognize and count the number of visitors and to see how visitors move around the site when they are using it. This helps us to improve the way our Site works, for example by ensuring that users are finding what they are looking for easily.

Standing alone, cookies do not personally identify you; they merely recognize your Web browser. Unless you choose to identify yourself by opening an account, or filling out a form, you remain anonymous to us.

Links

The Site may contain links to unaffiliated third-party websites. A link does not constitute an endorsement of the content, viewpoint, accuracy, opinions, policies, products, services, or accessibility of that website, and we are not responsible for their privacy practices. Once you link to another website from the Site you are subject to the terms and conditions of that website, including its privacy policy, and we therefore suggest that you read the privacy policies on all third party websites. We do not accept responsibility for the protection of any data supplied to other websites.

Changes To Policy

We may revise this Privacy Policy from time to time. The most current version of this Privacy Policy will govern our use of information about you and will be located on this page. If we make material changes to this Privacy Policy, then where appropriate we will post a notice on the Site prior to the effective date of the changes.

Contact

If you have any questions, comments or requests about the Site generally, please contact us by email to: enquiries@cnstrctusa.com

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