

CITYPAYASSOCIATES

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City Pay Associates Limited (CPA) – www.citypay.co.uk

Data Protection & Website Privacy Policy – Updated May 2018

Your information will be held by City Pay Associates Limited as part of our commitment to the General Data Protection Regulation (GDPR), effective from 25th May 2018.

This privacy notice is to let you know how City Pay Associates Limited look after your personal information. This includes what you tell us about yourself, what we learn by having you as a customer, the choices you give us about what marketing you want us to send you and how we protect the information you provide us to enable us to provide a service to you. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

Our Privacy Promise

We promise:

- To keep your data safe and private, including personal data, contact details and any data provided by you to our surveys.
- Not to sell or share your individual data, nor any data associated with our relationship with you.
- To give you ways to manage and review your marketing choices at any time.

If you have any questions or want more details about how we use your personal information, please contact us by phone 01371 810979 or email at info@citypay.co.uk.

We will regularly review and, where, necessary, update our privacy policy in line with GDPR Regulations and how they impact our business activities and data processing.

Data we collect	How we use it
<p>Contact Details of Customers/Clients</p> <p>To carry out our ongoing relationship with our clients and other contacts we maintain contact records which may include:</p> <p>Contact Name(s) & Job Titles Name of Organisation Organisation's Address Work Telephone Number(s) Work Email address(es) of Contacts</p>	<p>This fundamental information enables us to manage our relationship with our clients. Holding this information enables us to run our business in an efficient and proper way including managing our financial position, business capability, planning, communications, corporate governance and annual audit.</p> <p>We will retain your contact details while they remain relevant to our business relationship with you, or until you ask us to remove them from our records.</p>
<p>Survey Data</p> <p>Our business involves collection of pay, bonus and benefits data from corporate clients. This is collected annually from our participant client base, and with the permission of these organisations.</p> <p>Data includes individual salaries and bonus payments, job titles and functions, plus details of an organisation's pensions and benefit packages.</p> <p>Where personal information is provided we ask that our clients confirm this data is protected under the GDPR regulations and any permissions necessary for them to pass the information to us, have been granted. Any such information is held securely, by us, and no such personal information is divulged to any third parties, other than our employees and associates for the purpose of undertaking our legitimate business, and only when a confidentiality agreement has been signed by them.</p>	<p>The pay data gathered is aggregated, analysed and presented in a statistical report twice a year and is available online to subscribers as well as hard copy to purchase.</p> <p>The benefits data is aggregated as a report produced in July of each year. Again, available on the website to subscribers and sold in printed hard copy.</p> <p>We also carry out bespoke tailored consultancy using the aggregated data to provide averaged pay market data.</p> <p>No reports include any personal data which can be attributable to any person, company or organisation.</p> <p>All solely include aggregated, statistical data.</p>

Using your information in accordance with Data Protection Laws

Data Protection law says we are allowed to use personal information only if we have proper reason to do so. To use your personal information we will rely on the following conditions, depending on the activities we are carrying out:

- **Providing our contracts and services to you.** We will use the information to carry out our responsibilities in order to gather information and provide the products and services you have requested.
- **When we have to comply with applicable laws.** We may share or process your information if required legally to do so.
- **Legitimate interests.** To use your data for any other purpose described in this privacy policy we will rely on a condition known as 'legitimate interests'. This is the lawful basis under which we hold your personal or company data. 'Legitimate Interests' include analysis of salary, bonus and benefits data for publication in our Guides and on-line; but also enables us to provide you with our services more effectively, such as carrying out market research to improve our services: sending out information that we believe will be of interest to our clients; researching specific issues relevant to the client base.

If you chose not to give personal information

We only collect information that enables us to fulfil the contractual obligation we have with our clients, suppliers and employees.

If you choose not to provide information it may delay or prevent us from meeting our obligations.

You may ask us to stop providing you with newsletters, or marketing materials at any time by emailing (info@citypay.co.uk) or telephoning 01371 810979.

How long do we keep your information for?

We will keep your information on our secure electronic database for as long as you are a client of City Pay Associates Limited. Any paper copies of survey questionnaires are disposed of after 12 months (retained solely for validation purposes).

If you stop being a client we will archive your information for internal historical comparison analyses. This will remain in archive for a maximum of 5 years unless you request its removal.

Who do we share your information with?

We never share any individual client information with any other party, other than employees and associates of City Pay Associates who have signed a Confidentiality Agreement, and solely for the use of undertaking our business.

We do share aggregated data for purpose of fulfilling our contractual obligations.

How to get a copy of the information we hold?

You can request a copy of the information we hold by email (info@citypay.co.uk) or telephoning 01371 810979.

Alternatively, if you have any questions relating to our Privacy Policy please email us at info@citypay.co.uk

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Company registration number: 5618552
VAT registration number: 872 2322 37