



## **PRIVACY POLICY**

TOP Network is the trading name of TOP Network Group Ltd (Company No. 12879018). Our registered address is Kemp House, 160 City Road, London EC1V 2NX

Our Privacy Policy demonstrates the commitment of TOP Network to protecting the privacy of visitors to our website and to those who choose to work with us. The policy sets forth our website information collection and management practices as well as information you may submit to us by other means. By using this website or by sending us personal information you acknowledge and consent to our practices described below.

### **Data Protection**

TOP Network are committed to protecting your privacy. We adhere to the policies and regulations set out under the Data Protection Act and GDPR.

The General Data Protection Regulation (GDPR) provides new rights to individuals regarding the collection, storage and use of their personal data. This Privacy Policy has been updated to take account of any new requirements under GDPR, which will be enacted in the UK via a revised Data Protection Act. Also covered in this Privacy Policy are the requirements of the Privacy and Electronic Communications Regulations 2003 updated 2004 and 2011 (PECR).

### **Information that We Collect**

You may use our website without disclosing to us any personally identifiable information. TOP Network collects personally identifiable information from you only if you choose to provide it when you use our contact form, sign up to receive newsletters or contact us by e-mail or if you send us information by post. We use this information only to respond to your comments or questions or to provide services related to the specific purpose for which you submitted the information.

We also receive non-personally identifiable information through cookies and log files when you access our website. Certain technical information, such as your IP address (anonymized), page views, operating systems, web browser software, and referring and destination website, is automatically collected from your computer. Cookies are small computer files that we transfer to your computer's hard drive. Cookies allow us to statistically monitor how many people are using our site and for what purpose. TOP Network use information gathered from cookies and log files solely to generate broad demographic and user statistics to improve the content of our website. We do not link any information obtained from cookies or log files to personally identifiable information. You are always free to decline cookies if your browser permits, but in that case, some portions of our website may not operate properly.

### **What is personal data?**

Personal data means any information which relates to a living individual who can be identified either directly or indirectly by reference to an identifier such as their name, email address and other personal details.

### **Why do we process your personal data?**

We process your personal data for the following purposes:

- Respond to enquiries or requests that you send us
- To invite you to events related to your job where we are the Data Controller and where our client is the Data Controller and we are the Data Processor under contract
- To send you marketing information where we and/or our clients have lawful grounds.
- Staff administration including payroll and payroll administration, tax calculations, benefits and payments
- Performance assessments
- To monitor compliance with our policies and procedures
- General administration
- Recruitment
- Regulatory requirements
- Other processes related to the above.



### **Our Information Disclosure Practices**

We do not share your information with any third parties without your consent except as follows: (1) where such disclosure is necessary to comply with the law or protect the safety of our users or others, or (2) with service providers performing services on our behalf, which may include communications, database, event management, hosting, mailing and marketing services. Any service providers employed by TOP Network will have access to your information solely to the extent necessary to enable them to perform the service on our behalf. TOP Network has no obligation to monitor our website or the use of our website, or to retain the content of any user session. However, TOP Network reserves the right at all times to monitor, review and/or retain any information to comply with the law or protect the safety of our users or others.

If you have an enquiry as to the information we hold, or wish to have your personal information removed from our records and systems please contact us at [info@topnetwork.group](mailto:info@topnetwork.group)

### **Improved rights under the General Data Protection Regulation**

- **Data Subject Access Request:** You have the right to access the personal information we may hold about you. On receipt of such a request we will endeavour to respond to you as soon as possible, but at least within one calendar month. You must provide us with 2 forms of personal identity to ensure that we only disclose to you information which is relevant to you personally. You will not have to pay a fee to access your personal data (or to exercise any of the other 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.
- **Rectification:** You have the right to request that we amend any personal information that may be incorrect or require updating.
- **Erasure:** You have the right to request that we delete any personal information pertaining to you. Any questions about these rights may be sent to [info@topnetwork.group](mailto:info@topnetwork.group)
- **The right to restrict processing.** Individuals have a right to 'block' or suppress processing of personal data. If you decide to do this, we will continue to store the data, but not further process it until we have agreed a solution to the issue you have raised.

### **Is data shared with 3rd parties and if so, who?**

In order that we may fulfil a request to place work within or outside of our network we may have to share your personal data with other third parties. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **Is data processed outside of the EEA?**

Where our clients are located outside of the European Economic Area, they control the data and local or national rules apply. Data where TOP Network is the Data Controller is processed in the UK.

### **Information on our grounds for lawful processing?**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where we need to comply with a legal or regulatory obligation.
- Where we have your consent

### **How long do we keep your data?**

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, 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.

### **Security**

Our website employs industry standard security measures designed to protect against loss, misuse or alteration of information you provide us via our website. You should know, however, TOP Network cannot fully eliminate such risks, and TOP Network is not responsible for unauthorised access to information by those entities who have obtained such access through illegal means. The transmission of Information via the Internet is not completely secure. Any such transmission is at your own risk and you acknowledge and agree that we shall not be responsible for any unauthorised use, distribution, damage or destruction of your Information, except to the extent we are required to accept such responsibility by the GDPR, the Privacy and Electronic Communications Regulations or the Data Protection Act. Once we have received your Information we will use security procedures and features to prevent unauthorised access to it.

### **Linked Web Sites**

TOP Network may include links to external sites on its website from time to time. The inclusion of any link does not imply our endorsement of such external website or the products and services offered at such site. If you link to a third-party site from our website, any information you reveal on that site is not subject to this Privacy Statement. Therefore, you should consult the privacy policies of each site you visit. Your browsing and interaction on any other website or your dealings with any other third party service provider, is subject to that website's or third party service provider's own rules and policies. We do not monitor, control, or endorse the Information collection or privacy practices of any third parties. We encourage you to become familiar with the privacy practices of every website you visit or third party service provider that you deal with and to contact them if you have any questions about their respective privacy policies and practices. This Policy applies solely to Information collected by us through our website or services and does not apply to these third party websites and third party service providers.

### **Changes and Questions**

TOP Network reserves the right to revise this Privacy Policy at any time by posting a new Privacy Policy at this location. Please check this page periodically for changes. Your use of our website constitutes your acceptance of the terms of the Privacy Policy as amended or revised by us and you should therefore review this Privacy Policy regularly to ensure that you are aware of its terms.

### **Contact Us**

If you have any questions or concerns regarding our Privacy Policy or any questions about our site, you can send an email to us at [info@topnetwork.group](mailto:info@topnetwork.group) or by going through to our Contact Us page.

**This Privacy Policy was last updated on: 1<sup>st</sup> October 2020**