

# Privacy Policy

This privacy policy is available on our website and may be printed at any time. This privacy policy informs you about processing of your personal data.

## What are Personal Data?

We process personal data only to the extent necessary and for the purpose of providing a functional and user-friendly internet presence, including its contents and the services offered there. We also process your personal data for communication and for purposes set out in this Privacy Policy.

“Processing” of data means any operation or set of operations carried out with or without the aid of automated processes relating to personal data, such as collection, recording, organisation, sorting, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or integration, limitation, erasure or destruction.

The legal basis for data protection can be found, in particular, in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data, on the free movement of such data and repealing Directive 95/46/EC (“General Data Protection Regulation”, GDPR), the German Data Protection Act (BDSG) and Telemedia Act (TMG).

## Controller

We refer to third party providers named in this Privacy Policy who control your data. The Controller is any natural or business person, which decides on the purpose and means of data processing on its own or jointly with others.

The controller of your data processed is:

**Colette Wyatt**  
Chief Executive Officer

**Evolve**  
Unit 1 Pear Tree Business Park  
Desford Lane  
Ratby  
Leicestershire  
LE6 0PG  
Telephone: +44 116 298 7460

[www.evolve-consultants.co.uk](http://www.evolve-consultants.co.uk)

## Scope and location of Data Processing

We as well as our external service partners process your data for the purpose of providing the services, including providing hard- and software through such external service partners. You provide data if this is necessary for the aforementioned purposes.

The data categories affected are contact information, user behavior or other information that constitutes personal data provided to us.

We process your personal data for the following purposes:

- Communication in order to establish, implement and/or process a contractual relationship (also orally) with you (legal basis: Art. 6 para. 1 lit. b. GDPR);
- compliance with legal obligations, e.g. commercial, tax and social security detention obligations (legal basis: Art. 6 para. 1 lit. c. GDPR);
- Enforcement, exercise and defence of legal claims (legal basis: Art. 6 para. 1 lit. f. GDPR), with our legitimate interest that may be, for example, in the assertion of legal claims and defence in legal disputes;
- Your consent to data processing for the purpose named there (legal basis: Art. 6 para. 1 lit. a. GDPR); or
- As otherwise described in this Privacy Policy or information provided to you.

In the event you refrain from providing such data you may face legal disadvantages, for example, no answer to your email send to us.

In general, we process your personal data in the EU/EEA.

Furthermore, we have implemented technical and organisational measures to ensure that the data protection regulations are observed both by us and by external service providers. The website is operated through a safe SSL-connection. If an SSL-connection is activated third parties are prevented from reading any data that are transferred by you to us.

## Your Rights

You have the following rights:

- the right to access,
- the right to rectification or erasure,
- the right to restriction of processing
- the right to data portability,
- the right to withdraw your consent.

You further have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data based on point e or f of Art. 6 para. 1 GDPR, including profiling based on those provisions.

To act according to your rights set forth above you may contact us at [info@scudi.me](mailto:info@scudi.me)

You also have the right to lodge a complaint with a supervisory authority about our processing of your personal data.

The data are deleted if you withdraw your consent and/or such data are no longer necessary for the purpose of processing. We or the engaged third party services delete your data according to the following criteria: Time and completion of requests, settings provided by third party providers etc. Furthermore, we store your data if we are obliged to do so in accordance with legal retention periods (e.g. German Commercial Code (HGB) or German Fiscal Code (AO)).

## Visiting the Website

We (or the web space provider) collect data on each visit to our website (so-called server log files), which include:

name of the website visited, file, date and time of the visit, data amount transferred, information on a successful call, browser type as well as version, operating system of the user, referrer URL (the page visited before), IP address and the requesting provider as well as the following, if a mobile end device is being used:

country code, language, name of device, name of operating system and version.

We use these server log files only for statistical evaluations for the purpose of optimizing our services and in order to guarantee the stability and operational security of the website. When personal data (such as the IP-address) are stored the legal basis for this is Art. 6 para. 1 lit. c. GDPR based on our legal obligation for data safety or Art. 6 para. 1 lit. f. GDPR based on our legitimate interest of quality assurance.

## Cookies

Our website partly uses so-called technical cookies for a user friendly and technical adequate presentation of the website. Cookies are small text files which are stored on your device and in your browser.

Most of the cookies we use are so-called session cookies. After the end of the session these cookies will be deleted automatically. The session cookies are used in order to associate successive page requests with the individual users, who at the same time access our website. Other cookies will be stored on your device until you delete them. These cookies enable us to recognize your browser during your next visit.

**OPT-OUT:** You can adjust your browser to notify you, before you receive a cookie or to decide to accept cookies on a case-by-case basis, to completely or partly exclude all incoming cookies and to activate the deletion of cookies automatically when the browser is

closed. You may manage many online advertisement cookies provided by companies via the American web page <http://www.aboutads.info/choices/> or the web page of the European Union <http://www.youronlinechoices.com/uk/your-ad-choices/>. We would like to inform you that the usage and especially the convenience of usage without using any cookies may be limited.

In the event personal data are processed such processing is based on Art. 6 para. 1 lit. f. GDPR with our legitimate interest of the presentation of a user friendly and technical correct website, or, where required, your consent (legal basis Art. 6 para. 1 lit. a. GDPR).

## **Web Fonts**

This website uses so-called web fonts. When you visit a page, your browser loads the required web fonts into its browser cache in order to display texts and fonts correctly.

In the event personal data are processed such processing is based on Art. 6 para. 1 lit. f. GDPR with our legitimate interest of the presentation of a user friendly and technical correct website, or, where required, your consent (legal basis Art. 6 para. 1 lit. a. GDPR). If your browser does not support web fonts, a standard font will be used by your device.

## **Contacting us; emails**

If you send us any requests via email or otherwise contact us your details in this request, including the contact data, name, email address and other data provided respectively, are processed by us in order to deal with your inquiry or to be able to contact you at a later time for follow up questions. These data are processed only on the basis of your consent (legal basis Art. 6 para. 1 lit. a. GDPR) or on the basis of an initiating or existing business relationship with us (legal basis Art. 6 para. 1 lit. b. GDPR).

## **Data Processing for the use of our software and mobile application**

In the event you download our mobile application, we will process certain data. Such data include name, email, address and telephone number, your employer, country of residence, and any other personal information you may include in your interactions with us. We may also ask for additional information to assist us with the process of the mobile application.

We process your personal data for fulfilling our contractual or pre-contractual obligations (based on Art. 6 para. 1 lit. b. GDPR)), in particular, we use your data:

- To get in touch with you, communicate with you, update you and to facilitate your application,
- To offer an online-application system that is linked to our website,
- To respond to your questions or concerns,

- To carry out vetting of staff members (where required); this may involve our collection and use of sensitive personal information including information obtained from criminal background checks about offences or alleged offences and information relating to any proceedings for offences committed or allegedly committed,
- To verify your identity and get agreements signed with you, this may involve our collection and use of sensitive personal information such as your biometric data,
- When necessary and for the purposes of our legitimate interests to maintain adequate records, we may collect and handle information related to medical information, ethnic origin or criminal records,
- To assist in any disputes, claims or investigations relating to your application, or
- To comply with our legal, regulatory and professional obligations.

We may also use your non-sensitive and sensitive data with your explicit consent (based on Art. 6 para. 1 lit. a. GDPR, Art. 9 para. 1 lit. a. GDPR or Section 26 BDSG).

We only keep your personal information for as long as we need to, and for as long as we are required to keep it by law (for example due to legal retention periods, such as set forth in the German Commercial Code (Handelsgesetzbuch, HGB) or German Fiscal Code (Abgabenordnung, AO)). Criteria for the data storage and erasure are our internal policies, pre-set periods by the providers used and our economic and your personal interests.

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