



## **WEB PRIVACY AND COOKIE POLICY**

**Fresh Start Management Services Ltd**  
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## DEFINITIONS AND INTERPRETATION

The following definitions will be used throughout the policy:

- 'Our Site' means this website: [www.freshstartmanagementservices.co.uk](http://www.freshstartmanagementservices.co.uk)
- 'Account' means an account required to access and or use certain areas and features of Our Site.
- 'Cookie' means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and or when you use certain features of Our Site.
- 'UK and EU Cookie Law' means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended in 2004, 2011 and 2015, Data Protection Act 2018.
- 'We/Us/Our' means Fresh Start Management Services Ltd, a limited company registered in England under Company Registration number 8020709, whose registered address is 45 Queen Street, Deal, Kent and whose main trading address is Castle House, Castle Hill Avenue, Folkestone. CT20 2TQ.

### 1. INTRODUCTION

Fresh Start Management Services Ltd. understands that your privacy is important to you and that you care about how your information is used and shared online. We respect and value the privacy of everyone who visits Our Site and will only collect and use information in ways that are useful to you and in a manner consistent with your rights and Our obligations under the law.

This Policy applies to Our use of any and all data collected by Us in relation to your use of Our Site. Please read this Web Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Web Privacy and Cookie Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Web Privacy and Cookie Policy, you must stop using Our Site immediately.

### 2. INFORMATION ABOUT US

Our Site, [https://: www.freshstartmanagementservices.co.uk](https://www.freshstartmanagementservices.co.uk), is owned and operated by Fresh Start Management Services Ltd, a limited company registered in England under Company Registration Number 8020709, whose registered address is 45 Queen Street, Deal, Kent and whose main trading address is Castle House, Castle Hill Avenue, Folkestone, CT20 2TQ. Our VAT number is 134 7160 29. Registered with the Information Commissioner, number ZA141352.

### 3. SCOPE – What Does This Policy Cover?

This Web Privacy and Cookie Policy applies only to your use of Our Site. It does not extend to any websites that are linked to or from Our Site (whether We provide those links or whether they are shared by other users). We have no control over how your data is collected, stored or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

### 4. WHAT DATA DO WE COLLECT?

Some data will be collected automatically by Our Site, other data will only be collected if you voluntarily submit it; for example, when signing up for an Account. Depending upon your use of Our Site, We may collect some or all of the following data:

- 4.1 Name
- 4.2 Date of birth
- 4.3 Gender
- 4.4 Business/Company
- 4.5 Job title
- 4.6 Profession
- 4.7 Contact information such as email address and telephone numbers
- 4.8 Demographic information such as postcode
- 4.9 Personal information such as preferences and interests
- 4.10 Employment, work and history details. Education, qualifications and any other information you submit
- 4.11 IP address (automatically collected)
- 4.12 Web browser type and version (automatically collected)
- 4.13 Operating system (automatically collected)
- 4.14 A list of URLs starting with a referring site, your activity on Our Site, and the site you exit to (automatically collected)

## 5. HOW DO WE USE YOUR DATA?

- 5.1 All personal data is stored securely in accordance with the principles of the Data Protection Act 2018. For more details on security please see **section 6**.
- 5.2 We use your data to provide the best possible services to you. This includes:
  - 5.2.1 Providing and managing your access to Our Site
  - 5.2.2 Personalising and tailoring your experience on Our Site
  - 5.2.3 Personalising and tailoring Our services for you
  - 5.2.4 Responding to communications from you
  - 5.2.5 Market research
  - 5.2.6 Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience.
- 5.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email and or telephone and or text message and or post with information, news and offers on Our Services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended in 2004, 2011 and 2015.

## 6. HOW and WHERE DO WE STORE YOUR DATA?

- 6.1 We only keep your data for as long as We need to in order to use it as described in **section 5**, and or for as long as We have your permission to keep it. Please see Our **Data Protection Policy** for further details.

- 6.2 Your data will only be stored within the United Kingdom or the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland and Liechtenstein).
- 6.3 Data security is of great importance to Us, and to protect your data We have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through Our Site.
- 6.4 Notwithstanding the security measures that We take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to Us data via the internet.

## **7. DO WE SHARE YOUR DATA?**

- 7.1 We may, with your permission, share your data with other companies in Our group. This includes Fresh Start in Education Ltd.
- 7.2 We may share some or all of your data with potential employers to ascertain their interest in you for a specific vacancy.
- 7.3 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers and other information. All such data will be anonymised and will not include any personally identifying information.
- 7.4 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal information; for example, where We are involved in legal proceedings, where We are complying with the requirements of legislation, a court order, or a governmental authority. We do not require any further consent from you in order to share your data in such circumstances and will comply as required with any legally binding request that is made of Us. Data will only be shared and used within the bounds of the law.

## **8. WHAT HAPPENS IF OUR BUSINESS CHANGES HANDS?**

- 8.1 We may, from time to time, expand or reduce Our business and this may involve the sale and or the transfer of control of all or part of Our business. Data provided by users will, where it is relevant to any part of Our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of Our Data Protection Policy, be permitted to use the data for the purposes for which it was originally collected by Us.
- 8.2 In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes. You will not be given the choice to have your data deleted or withheld from the new owner or controller.

## 9. HOW CAN YOU CONTROL YOUR DATA?

- 9.1 When you submit information via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails.
- 9.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, these services will not prevent you from receiving marketing communications that you have consented to receiving.
- 9.3 For further information please see Our **Data Protection Policy**

## 10. YOUR RIGHT TO WITHHOLD INFORMATION

- 10.1 You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.
- 10.2 You may restrict your internet browser’s use of Cookies. For more information, see **section 12** in this policy and the Privacy settings of your Browser.

## 11. HOW CAN YOU ACCESS YOUR DATA?

You have the legal right to ask for a copy of any of your personal data held by Us (where such data is held). Please contact Us for more details at [recruitment@freshstartmanagement.co.uk](mailto:recruitment@freshstartmanagement.co.uk) or using the contact details in section 13. All Data Access Requests must be made in writing and may take up to 30 days to fulfil.

## 12. COOKIES

Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our services. Our Site also uses analytics services provided by Google Analytics and Open tracker, which also use Cookies. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling Us to better understand how people use Our Site. You can restrict or suspend the use of Cookies from within the Privacy settings of your Browser.

## 13. CONTACTING US

If you have any questions about Our Site or this Web Privacy and Cookie Policy, please contact Us by email at [recruitment@freshstartmanagement.co.uk](mailto:recruitment@freshstartmanagement.co.uk), by telephone on 0203 409 3139, or by post to the Data Protection Officer at Castle House, Castle Hill Avenue, Folkestone, CT20 2TQ. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as in section 11). Data Access Requests must be made in writing and accompanied with a form of recognised identification as proof of your right to make the request. Further information is available in Our **Data Protection Policy**.

#### **14. CHANGES TO OUR WEB PRIVACY and COOKIE POLICY**

We may change Our Web Privacy and Cookie Policy as We deem necessary from time to time, or as may be required by law. Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Web Privacy and Cookie Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

Created: July 2017  
Reviewed: May 2021  
Next review: May 2022