

ALEPH CONSULTING PRIVACY NOTICE**(a) Who we are:**


Aleph Consulting is the business name registered to Deborah Mattana – Senior Consultant providing services in Education, Generalist Advice, Business Management and Administration to individuals, establishments and organisations in the private and public sector.

Contact details:**Aleph Consulting**

16/15 Town Range
Gibraltar
GX11 1AA

 www.alephconsultingservices.com

(b) Contact details of the Data Protection Officer;**Deborah Mattana**

 00350 54064142

 dmattana@alephconsultingservices.com

As your service provider, Aleph Consulting is the data controller. This Policy explains how we use your personal information

This information we collect from you may include the following:

- Name
- Title
- Addresses
- Telephone numbers
- E-mail addresses
- Date and place of birth
- Nationality and Citizenship
- Proof of address
- Entitlement to Benefits
- Occupation
- Financial Information (debt clients) Income, expenses and debts
- Household: Marital status, Dependants
- **Any other information which may be relevant to the Service we provide to you.**

(c) Why we need this information:

Purpose for which the information is collected and used:

The requirement to provide personal data is a contractual requirement, necessary to enter into a contract with Aleph Consulting in order to facilitate the provision of our services.

The information we collect about you is necessary for:

- The provision of our consultancy services in business management, administration, generalist advice and education;
- The performance of a contractual service that is provided to you (Article 6(1)(b) of the GDPR);
- Keeping you informed about our services

If you fail to provide certain information where requested, Aleph Consulting may not be able to perform the contract entered into with you, or we may be prevented from complying with our legal obligations.

(d) Consent

- Where we rely on your consent to process your personal information, you have the right to withdraw such consent to the further use of your personal information. The right to withdraw consent must be requested in writing to the Data Protection Officer.
- We may use cookies to assist us in improving our Website by collecting information about you and your device. By using our website you are consenting to the use of cookies

(e) Accuracy

If at any point you believe the information we hold and process about you is incorrect, you can submit a written request to see this information and have it corrected.

(f) What we do with your personal data

The data we collect about you is processed by Aleph Consulting. We have appropriate measures in place to oversee the protection and effective and secure processing of your personal data.

(g) Why the protection of your data is important to us:

Aleph Consulting are committed to protecting the privacy of all our clients.

We collect personal information about you in normal discharge of our duties and obligations to you, ensuring that we are fully compliant with data protection regulations.

(h) The period for which the data will be kept:

Aleph Consulting will retain Personal Information for:

- As long as necessary to fulfil the purpose for which it was collected or;
- as long as necessary to respond to concerns you raise about the advice you received;
- to comply with legal, regulatory, accounting or reporting requirements or;
- a minimum period of six years.

After this time, your information will be destroyed securely.

We may wish to use the information you provide us with for marketing purposes (such as name, e-mail addresses, etc) to notify you about our services, promotional offers, events and other useful information. This information is not shared with third parties and you can request to unsubscribe via e-mail if you so wish. This information will be stored by us until such time as you notify us in writing that you no longer wish to receive such correspondence from us.

(i) Whether the information will be shared, and if so with who;

Aleph Consulting will not share your personal information with anyone unless we have a valid purpose and we will only disclose it to the following parties:

- Third parties who provide services to us or that act as our agents. We will take all reasonable steps to ensure that the service provider or agent is subject to appropriate data processing requirements and that they impose such requirements on any of their service providers or agents
- Third parties who have entered into contractual arrangements with us to provide services we need to carry out our everyday business activities such as partner support specialists, document management providers, secure login and email providers, IT suppliers and outsourced business process management providers.
- Data protection authorities
- Other Third parties which are relevant to the service we provide to you, where you consent to such disclosure.

(j) Whether the information will be transferred outside of the EEA;

The information you provide to us will be transferred to and stored securely in the European Economic Area ("EEA"). However, from time to time, your personal data may be transferred to, stored in, or accessed from a destination outside the EEA.

Where we transfer your personal data outside the EEA, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by Aleph Consulting in the EEA.

In other circumstances the law may permit us to otherwise transfer your personal data outside the EEA. In all cases, however, we will ensure that any transfer of your personal data is compliant with data protection law.

(k) Information about the rights of individuals under the GDPR

You have several rights which you can exercise at any time relating to the personal information that Aleph Consulting hold about you and use in the ways set out in this notice. If you are concerned about the way Aleph Consulting has handled your personal data and you would like to exercise these rights, please contact us to discuss.

While your rights under GDPR are important to us please be aware that there may be some instances where we cannot comply with a request that you make as the consequence might be that:

- In doing so we could not comply with our own legal or regulatory requirements
- In doing so we could not provide services to you and would have to cancel your client agreement

We will inform you if any of the above situations arise and if we are unable to comply with your request.

The right of individuals to lodge a complaint with the Gibraltar Regulatory Authority ("GRA");

If you believe that Aleph Consulting have breached data protection laws when using your personal information, you have a right to complain to the Gibraltar Regulatory Authority.

You can visit the GRA's website at <http://www.gra.gi/> for more information. Please note that lodging a complaint will not affect any other legal rights or remedies that you have.

Gibraltar Regulatory Authority
2nd Floor
Eurotowers 4
1 Europort Road
Gibraltar
GX11 1AA.

