

Client Privacy Notice



FDM Group Limited (FDM Group) respects the privacy of all clients, consultants, staff and everyone else associated with us. We will collect and use personal data responsibly and in ways that are consistent with our obligations and your rights under the law.

This Privacy Notice explains how, if you are one of our Clients, FDM Group uses and protects your personal data, as well as your rights in respect of it, how to exercise your rights and how to contact us. More information about how FDM Group processes personal data in general can be found in our [Privacy policy](#).

Information about other people

If you provide information to us about any other people, you must give them a copy of this Privacy Notice so that they understand how their information will be used. You should only provide information about them if you are authorised to do so.

Changes to this Privacy Notice

Privacy laws and practice are constantly developing and we aim to meet high standards. Our policies and procedures are, therefore, under continual review. We may, from time to time, update our Privacy Notice. If we want to make any significant changes to the way in which we will use your personal data we will contact you and, if required, seek your consent.

About us

Unless we say otherwise, FDM Group is the data controller in respect of all personal data we obtain about you. This means that we are responsible for ensuring that we do so in full compliance with data protection and all other related privacy laws.

You can contact us as follows:

Address: FDM Group Limited, 3rd Floor, Cottons Centre,
Cottons Lane, London. SE1 2QG

Phone: 020 3056 8240

Email address: privacy@fdmgroup.com

If you have any questions or concerns about how we are handling your personal data, you can direct them to privacy@fdmgroup.com or you can make a complaint to the Information Commissioner's Office (www.ico.org.uk).

Security

We take the security of personal data seriously. We use security technology, including firewalls, password protection and encryption to safeguard information and have procedures in place to ensure that our paper and computer systems and databases are protected against unauthorised disclosure, use, loss and damage. We have processes in place to deal with a data breach in the unlikely event one should occur.

We only use third party service providers where we are satisfied that they provide adequate security for your personal data.

Categories of personal data that we may process

personal details	History	Diversity and inclusion (where relevant)
Title, name, any 'known as' name and personal pronoun	Products and services you have asked us to provide (and whether we have done so)	Marital status
Contact details such as address, email address and phone number(s)	Products and services others have asked us to provide for you (and whether we have done so)	Age / date of birth
Job title		Religious beliefs
Organisation(s) you work for or represent	How you are known to FDM Group	Gender
Your authority to contract for your organisation	Call recordings, correspondence and meeting records	Ethnicity
KYC information	Details of any feedback you provide, or which others (including our consultants and other staff) may provide about you	Sexual orientation
Colleagues and others you have a business relationship with	Details of any incident involving you or someone else you are connected with	Political opinions
Social media identifiers		Disability / health conditions
Disability / health conditions (if applicable)		
		Preferences
		Details of any consents and preferences

Certain personal data is designated as ‘special category data’ in law, which means it has special protection. This includes: information about health, race or ethnicity, genetic and biometric data and information concerning a person’s sex life or sexual orientation.

Sources of personal data

<p>You</p> <p>Someone else in your organisation</p> <p>Other organisations you are associated with</p> <p>Our own records or those from other FDM Group companies</p> <p>Recordings of video conferences and events</p>	<p>Our partners</p> <p>Social media (such as LinkedIn and social media searches)</p> <p>Companies House</p> <p>Other clients</p> <p>Suppliers</p> <p>Our candidates and consultants</p> <p>Complainants</p>	<p>Organisations we use for</p> <p>KYC checks</p> <p>Insurers</p> <p>Police and other law enforcement agencies</p> <p>Legal and other professional advisers</p> <p>Regulators</p>
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We may obtain some personal data via cookies on our website and may track whether you have opened emails we have to you. More information about this can be found in [here](#).

Automated decisions using personal data

We do not normally take any solely automated decisions.

Purposes for which we process personal data and the legal basis for doing so

We process personal data for a number of purposes, which are:

Purpose	Legal Basis
<p>Administration and service delivery. Client onboarding including KYC checks; administration of any requests you make of us such as to enquire about our services or the supply of consultants to your organisation; delivery of our services to you or your organisation; client management; payment administration and collection</p> <p>Security. Includes event administration and admission, event security, dealing with incidents. obtaining insurance</p> <p>Direct marketing. Including creating a personal profile for you and maintaining details of your preferences.</p> <p>Commercial activities. Administration of and carrying out FDM Group commercial activities including those that have been specifically agreed with you / your organisation (<i>as applicable</i>)</p>	<p>personal data</p> <p>It is necessary to fulfil the contract that you (or someone else at your organisation) are going to enter into or have entered into with us and/or</p> <p>Consent or</p> <p>It is necessary for compliance with a legal obligation and/or</p> <p>It is necessary for our legitimate interests and others in your organisation / attending our events which ensure we meet our policies and objectives and manage our business effectively and meet any standards we have promised.</p> <p>and, in addition for ‘special category’ personal data</p> <p>Explicit consent or</p> <p>It relates to personal data that are manifestly made public by you and/or</p> <p>It is necessary for insurance purposes and/or</p> <p>It is necessary for the establishment, exercise or defence of legal claims</p>

Purpose	Legal Basis
<p>Health and welfare. Dealing with any medical issues, injuries, allergies, special needs and mental health concerns, providing physical and emotional support</p>	<p>personal data</p> <p>It is necessary to fulfil the contract that you are going to enter into or have entered into with us and/or</p> <p>It is necessary for our legitimate interests which are to ensure we are able to effectively meet our responsibilities and meet insurance requirements</p> <p>and, in addition for ‘special category’ personal data</p> <p>Explicit consent or</p> <p>It relates to personal data that are manifestly made public by you and/or</p> <p>It is in your vital interests or the vital interests of another person and/or</p> <p>It is necessary for the purposes of preventative medicine, medical diagnosis or the provision of health or social care or treatment and/or</p> <p>It is necessary for the establishment, exercise or defence of legal claims</p>
<p>Diversity and inclusion monitoring. Diversity monitoring and compliance (such as in respect of ethnicity, gender, race, age and disability) and providing equal opportunities</p>	<p>personal data</p> <p>It is necessary for compliance with a legal obligation and/or</p> <p>It is necessary for our legitimate interests which are to ensure we meet FDM Group’s objectives and requirements set by stakeholders or government agencies</p> <p>and, in addition for ‘special category’ personal data</p> <p>Explicit consent or</p> <p>It is necessary for the purposes of equality of opportunity and/or</p> <p>Is necessary for the establishment, exercise or defence of legal claims</p>

Purpose	Legal Basis
<p>Quality and improvement monitoring. Including client satisfaction surveys</p> <p>Record keeping. Maintaining FDM Group records including historical records of resources, incidents and compliance</p> <p>Reputation. FDM Group reputation management</p> <p>Publicity. Publicity and media activity</p>	<p>personal data</p> <p>It is necessary for our legitimate interests and those of others which are to ensure effective administration of FDM Group activities and to ensure they meet FDM Group's objectives and it is in our legitimate interests to maintain records.</p> <p>and, in addition for 'special category' personal data</p> <p>Explicit consent or It is necessary for scientific or historical research or statistical purposes and/or Is necessary for the establishment, exercise or defence of legal claims</p>
<p>Security. Including maintaining security and safety of our staff, candidates, consultants, clients, systems, data and networks.</p>	<p>personal data</p> <p>It is necessary for compliance with a legal obligation and/or It is necessary for our legitimate interests and those of others which are to ensure effective safety of candidates, consultants, other staff, our clients and FDM assets</p> <p>and, in addition for 'special category' personal data</p> <p>Explicit consent or It relates to personal data that are manifestly made public by you and/or It is necessary for insurance purposes and/or It is necessary for the establishment, exercise or defence of legal claims</p>
<p>Legal matters. Including dealing with legal claims and dispute.</p>	<p>personal data</p> <p>It is necessary to fulfil the contract that you are going to enter into or have entered into with us and/or It is necessary for compliance with a legal obligation; and/or It is necessary for our legitimate interests which are to ensure we manage FDM Group's business effectively</p>

Legal matters. Including dealing with legal claims and dispute.

and, in addition for ‘special category’ personal data

Explicit consent or
It relates to personal data that are manifestly made public by you and/or
It is necessary for the establishment, exercise or defence of legal claims

Who we may disclose your personal data to

You
Your employer
Your colleagues (where relevant)
Emergency contacts
Relevant personnel in our other
[FDM Group companies](#)

Complainants
Insurers
Professional advisers
Regulators
Courts or tribunals
Government agencies (*where we have a legal obligation to do so*)

We sometimes use the services of data cleansing organisations to help ensure the data in our systems is accurate and up-to-date. This usually involves us making data available to the service provider and the provider returns to us any updates.

Location of your personal data

In most cases, we normally keep your personal data within the United Kingdom or the European Economic Area. However, some of our services providers (such as those providing technology services to FDM Group) use facilities in other countries and this may mean your personal data is held in these other countries.

FDM Group is a global business and we may use staff in other locations to perform finance functions such as billing and collecting payment, carry out our internal HR or legal functions, or analysing data about our business and its performance. We may also provide contact and other relevant information to other [FDM Group Companies](#) to support and develop the relationship with your organisation.

Wherever we transfer your personal data outside of the United Kingdom, we will take proper care to ensure that it is protected in accordance with this Privacy Notice and applicable privacy laws.

Where we use service providers that provide their services in countries that are not deemed to have an adequate level of protection for personal data, we will normally use the United Kingdom approved 'Standard Contractual Clauses' as the legally accepted mechanism to allow the transfer and protect your data protection rights.

How long we keep your personal data for

The duration for which we keep personal data depends on your relationship with us and whether you are an existing client. We will normally keep your personal data for 3 years after you / your organisation cease to be involved with FDM Group or 3 years after our last contact with you / your organisation (*whichever is longer*). After this time period we will securely delete your personal data or anonymise / pseudonymise it unless we have a legal basis for keeping it.

In the unlikely event that there is a complaint or incident which involves or affects you, we may keep your personal data for 3 years after the matter is resolved.

Your legal rights in respect of your personal data

You have a number of legal rights over your personal data which are:

Right	Explanation
Access	You have the right to receive a copy of the personal data that we hold about you. We will need proof of identity and proof of authority if the request comes from someone other than you. This will ensure we only provide information to the correct person.
Withdraw consent to direct marketing	You can exercise this right at any time. Just send an email to privacy@fdmgroup.com and we will take care of this for you.

Right	Explanation
Withdraw consent to other processing	Where the only legal basis for our processing your personal data is that we have your consent, you can withdraw that consent at any time, and we will have to stop processing your personal data. Please note, this does not mean that processing carried out before you withdrew your consent is unlawful.
Rectification	If you think any of the personal data we hold about you is inaccurate – please contact us at privacy@fdmgroup.com and we will check and, if necessary, amend our records.
Restriction	In limited circumstances you may be able to require us to restrict our processing of your personal data. For example, if you think what we hold is inaccurate and we disagree, we may restrict what we do with your personal data until the accuracy has been verified.
Erasure	In some circumstances, for example, where we have no legal basis for keeping your personal data, you may be entitled to require us to delete it.
Objection	Where our processing is based on it being in our legitimate interests, you may be entitled to object to us processing it.
Portability	Where you have provided personal data to us electronically, you may be entitled to require us to provide that data to you electronically or to transmit it to someone else.
Complain	If you have any concerns or complaints about how we are handling your personal data we would prefer you to get in touch with us directly so that we can try to resolve the You can also contact the Information Commissioner's Office at www.ico.org.uk

Some of these legal rights are subject to exceptions which means that we may be entitled, or required, to refuse to comply with a request

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