

Privacy Notice

1. Who We Are

TMC Strategic Communications ('we' or 'us' or 'our') gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and law. This notice provides you with the necessary information regarding your rights and obligations, and explains how, why and when we collect and process your personal data.

TMC's registered office is at 35-37 High Street, Congleton, CW12 1AX and we are a company registered in England and Wales under company number 5697932. We are registered on the Information Commissioner's Office Register of Data Controllers under registration number ZA354610, and act as the data controller/data processor. Our designated Appointed Person for the organisation is Adrian Whitehurst, and we can be contacted at gdpr@wearetmc.com.

2. Information That We Collect

TMC processes your personal information to meet our legal, statutory, and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than already specified in this notice. The personal data that we collect includes the following:

Customers	Suppliers	Employees/Job Candidates
Name	Name	Name
Address	Address	Date of birth
Email address	Email address	Home Address
Contact telephone number	Bank details	Personal email/Business email
Website address	Contact telephone number	Home/work telephone number
Bank details	Website address	Mobile telephone number
VAT number	VAT number	National insurance number
Company registration number	Company registration number	Passport number
		Driver's licence number
		Special category date (health/medical information)
		Bank details
		Tax details
		Pension details

We collect information in the ways listed below: -

- in person
- phone
- email
- online form
- employment CV's
- printed forms

3. How we Use Your Personal Data (Legal Basis for Processing)

TMC takes your privacy very seriously and will never disclose, share or sell your data without your consent, unless required to do so by law. We only retain your data for as long as is necessary and for the purposes specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw consent at any time.

The purposes and reasons for processing your personal data are detailed below: -

- We collect your personal data in the performance of a 'contract' to enable us to provide goods and services.
- We collect your personal data from your CV for recruitment purposes if 'consent' is provided
- We collect and store your personal data as part of our 'legal obligation' for business accounting and tax purposes.
- We collect your data if you have 'consented' for us to contact you via email, post and or telephone to keep you updated with relevant information regarding the services offered by TMC.
- We collect your data if you have requested information from us so that we can respond to your request 'legitimate interest'.

4. Your Rights

You have the right to access any personal information that TMC processes about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to update/correct it as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the relevant request; this is to ensure that your data is protected and kept secure.

5. Sharing and Disclosing Your Personal Information

We do not share or disclosure any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. TMC uses third parties to provide the below services and business functions, however all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

Harts Limited

Accounting Services & Tax Returns

The only information we provide to them is a name, address, telephone number, tax details, bank details and pension details so that they can meet business and legal requirements.

For more information about Harts Limited, please read their Privacy Notice at <https://www.harts-ltd.com/privacy-cookie-policy/>

HMRC

Business and Tax Information

The information we provide to them is required for legal purposes, this includes name, address, tax details, pension details, bank details.

For more information about HMRC, please read their Privacy Notice at <https://www.gov.uk/help/privacy-policy>

Synergist

CRM Management tool for managing clients and suppliers and invoicing

The only information we provide to them is a name, address, telephone number, email address and bank details.

For more information about Synergist, please read their Privacy Notice at <https://www.synergist.co.uk/privacy-policy>

Blue Spot

IT Support for TMC to set up and maintain all IT services and security.

For more information about Blue Spot, please contact <https://www.bluespotcomputers.com/support/>

Campaign Monitor

Email Campaign Services

The only information we provide to them is a name and email address if we are sending out an email campaign.

For more information about Campaign Monitor, please read their Privacy Notice at <https://www.campaignmonitor.com/policies/>

Google Analytics

Business Data Analysis

For more information about Google Analytics, please contact <https://policies.google.com/privacy?hl=en-GB>

SEMRush

Online visibility management and content marketing SaaS platform

For more information about SEMRush, please contact <https://www.semrush.com/company/legal/privacy-policy/>

Atlassian

Software Development Company

For more information about Atlassian, please contact

<https://www.atlassian.com/trust/privacy>

Microsoft

Office Software Company

For more information about Microsoft, please contact

<https://privacy.microsoft.com/en-gb>

Hotjar

Behaviour Analytics Tool

For more information about Hotjar, please contact

<https://www.hotjar.com/legal/policies/privacy/>

Artificial Intelligence (AI)

As part of the retained services agreement, TMC will use enterprise AI tools to build efficiency into workflows. TMC does not allow AI to use its data for the LLM to learn from and has elected to reside data within the EEA to avoid data leaving EEA & UK jurisdiction. TMC does not use AI tools when dealing with confidential or personal information. Straumann UK should advise TMC when sharing data if it is not in the public domain, is confidential or contains trade secrets so that it can be managed securely.

6. Safeguarding Measures

TMC takes your privacy seriously and we take every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including: -

Penetration testing, encryptions of IT equipment and devices, SSL Certification for all websites and email communications, pseudonymisation of any shared data, as well as a need to know restriction on data and multiple layers of authentication to allow access to authorised employees only.

We securely dispose of any hard copies of printed materials and personal information.

More details are available on request, please email gdpr@wearetmc.com.

7. Consequences of Not Providing Your Data (If applicable, see Article 13(2)e)

You are not obligated to provide your personal information to TMC however, as this information is required for us to provide you with our services and deliver your goods, we will not be able to offer all of our products or services without it.

8. How Long We Keep Your Data

TMC only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your basic personal data (name, address, contact details) for a minimum of 6 years after which time it will be destroyed.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

9. Special Categories Data

Owing to the services that we offer, TMC sometimes need to request sensitive personal information from you if we were undertaking a research project. Where we collect sensitive personal data, we will only request the information required for the specified purpose and always ask for your explicit consent through a signature.

10. Cookie Usage

Strictly Necessary Cookies; Essential cookies that remember your preferences, which always need to remain 'on'.

Advanced Cookies; Measure website metrics and your performance experience using Insights tags.

Website Metrics

This website uses Google Analytics and other Insights Tags to collect information about how people use this site. We do this to ensure it's meeting its users' needs and to understand how it can be improved.

If browsing The Site, the tags will collect generic information about your session to distinguish you as a unique user and to help continually improve performance e.g. your Operating System, Browser, General Demographics and Behaviour. We do not allow Google to use or share our analytics data.

The following cookies are currently set:

Name	Expires	Cookie Type	Typical Content
_ga	2 years	Advanced	To store and count page views.
_gid	24 hours	Advanced	To store and count page views.
Ln_or	1 day	Advanced	Used to determine if Oribi analytics can be carried out on a specific domain
hjSessionUser	1 year	Advanced	Stores a unique user id, used by Hotjar analytics.
hjIncludedInSessionSample	2 minutes	Advanced	Set to determine if a user is included in the data sampling defined by your site's daily session limit.
_hjAbsoluteSessionInProgress	30 minutes	Advanced	Used to detect the first pageview session of a user.
hjFirstSeen	30 minutes	Advanced	Identifies a new user's first session.
hjIncludedInPageviewSample	2 minutes	Advanced	Set to determine if a user is included in the data sampling defined by your site's pageview limit.
hjSession	30 minutes	Advanced	Holds current session data. Ensures subsequent requests in the session window are attributed to the same session.
CLID	12 months	Advanced	Microsoft Clarity set this cookie to store information about how visitors interact with the website. The cookie helps to provide an analysis report. The data collection includes the number of visitors, where they visit the website, and the pages visited.
_clck	12 months	Advanced	Microsoft Clarity sets this cookie to retain the browser's Clarity User ID and settings exclusive to that website. This guarantees that actions taken during subsequent visits to the same website will be linked to the same user ID.
_clsk	1 day	Advanced	Microsoft Clarity sets this cookie to store and consolidate a user's pageviews into a single session recording.
_zitok	12 months	Advanced	First-party cookie set by ZoomInfo to identify unique visitors.
Vuid (and other associated Vimeo cookies)	12 months+	Advanced	To store the user's usage history, in relation to the embedded video players.
PHPSESSID	Session	Strictly Necessary	To provide functions across pages
wordpress_test_cookie	Session	Strictly Necessary	To read if cookies can be placed.
moove_gdpr_popup	Session	Strictly Necessary	To store cookie consent preferences.

Managing Cookies

We will not use cookies to collect personally identifiable information about you.

You can opt out of Google's use of cookies by visiting Google's Ads Settings page: <http://www.google.com/settings/ads>.

If you would not like to be tracked during your visit you can install a Do Not Track Plugin for Google Chrome or enable the Do Not Track feature in Firefox.

You can also visit <http://www.aboutCookies.org/> or <http://cookiepedia.co.uk/> for further information how to manage and delete Cookies.

Please be aware that restricting cookies may impact on the functionality of our website.

11. Lodging A Complaint

TMC only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

TMC Strategic Communications
35-37 High Street, Congleton, Cheshire CW12 1AX
T: +44 (0)1260 295700
E: gdpr@wearetmc.com

Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
T: 0303 123 1113 (local rate) or 01625 545 745 (national rate)
E: enquiries@ico.org.uk

12. Summary

You can modify or remove consent at any time, which we will act on immediately, unless there is a legitimate interest or legal reason for not doing so.