



1. WHO ARE WE?

1.1 MiCAP Group Ltd. We are a lead generation company providing business energy claims services to our UK client base. As such, your privacy is important to us, we take our responsibilities seriously and will always respond quickly and courteously to any request. You can contact us using the details below:

By email to our Data Protection Officer: enquiries@micapgroup.com

By post to: MiCAP Group Ltd

Building 18 Gateway 1000 Whittle Way, Arlington Business Park, Stevenage, Hertfordshire, England, SG1 2FP

By Phone: (0) 207 101 3341

2. OUR GDPR POLICY

2.1. We are committed to safeguarding the privacy and accuracy of the personal data of our website visitors, service users and email recipients.

2.2. This policy applies where we are acting as a Controller with respect to the personal data of our website visitors, service users, email recipients and personal data collected from public sources; in other words, where we determine the purposes and means of the processing of that personal data.

2.3. This policy also applies where we determine the purpose and means of the processing jointly with our clients and other companies, or where we are acting as a Processor, working on behalf of our clients to process data as required by them. In this policy, "We", "Us" and "Our" refer to MiCAP Group LTD.

2.4. Any reference to a Data Subject means a natural person whose personal data is processed by us as a Data Controller, Joint Controller or as a Data Processor, in other words, you.

2.5. Any reference to the GDPR applies to both the UK GDPR and EU GDPR. Likewise, any reference to EU countries will also apply to the UK. This will remain the case so long as the UK is subject to an adequacy decision by the EU. Should there be a conflict between the two, the version that grants data subjects the greatest protection will apply.

3. HOW WE USE YOUR PERSONAL DATA

We aim to be transparent about how we handle your data. In this section, we outline the types of personal data we might process. If we acquire personal data not directly from you, we'll specify its source and the reasons for processing it. Crucially, we'll also clarify the legal grounds for processing that concern both you and us.

Types of Personal Data We Might Process:

The General Categories of Personal Data That We May Process:

3.1. USAGE DATA

We may process data about your use of our website and services (“Usage Data”). The Usage Data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the Usage Data is Google Analytics as well as our analytics tracking system. This Usage Data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services, and tailoring any communication with you. We, of course, use this data to help us run our business as well as we can.

3.2. ACCOUNT DATA

We may process your Account Data (“Account Data”). The Account Data may include your name, email address, company information, and other contact and other related information we may collect about you. The source of the Account Data is generally you or your employer. The Account Data may be processed for the purposes of providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is the performance of a contract between you and us [or your employer] and/or taking steps, at your request, to enter into such a contract. In some cases, we may also rely on Legitimate Interest as our lawful basis where we use your data for marketing purposes or in order to operate our business and improve our services.

3.3. SERVICE DATA

We may process your personal data that are provided in the course of the use of our services (“Service Data”). The Service Data may include name, email address, telephone number, and other related information. The source of the Service Data is you or your employer. The Service Data may be processed for the purposes of providing our services and communicating with you. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

3.4. ENQUIRY DATA

We may process information contained in any enquiry you submit to us regarding goods and/or services (“Enquiry Data”). The Enquiry Data may be processed for the purposes of us offering, marketing and selling relevant goods and/or services to you. The legal basis for this processing is consent, which may be withdrawn by you at any time by contacting us, or contract and/or legitimate interest where your requests represent an invitation to send you information about our services.

3.5. NOTIFICATION DATA

We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (“Notification Data”). The Notification Data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent, which may be withdrawn by you at any time by contacting us.

3.6. CORRESPONDENCE

We may process information contained in or relating to any communication that you send to us (“Correspondence Data”). The Correspondence Data may include your name, email address and the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The Correspondence Data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website, business and communications with users.

3.7. PUBLIC DATA

We may process information found on public social networking profiles and other from other publicly available sources (“Public Data”). This data may include name, employment information, career information, education details, job title, and other relevant information. Public Data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you and/or your employer. The legal basis for this processing is our legitimate interests, namely the administration of our business, to develop our business, and in order for us to make a profit.

3.8. LEGAL CLAIMS DATA

We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure (“Legal Claims Data”). The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

3.9. PROFESSIONAL USE DATA

We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice (“Professional Use Data”). The legal basis for processing Professional Use Data is our legitimate interests, namely the proper protection of our business against risks.

3.10. THIRD PARTY DATA

We may process any of your personal data where we purchase this data from a third party. This includes name, address, email, phone number, other contact details, employment details etc. Where we purchase data, we will ensure that the supplier has the appropriate lawful basis in place and is GDPR compliant. We will also ensure that we have appropriate evidence of consent where necessary or have an alternative appropriate lawful basis and GDPR compliance processes in place to allow us to use your data.

In addition to the specific purposes for which we may process your personal data set out in this Section, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

4. BASIS OF LEGITIMATE INTEREST

Our legal foundation for processing is grounded in our Legitimate Interest in handling your information. We have meticulously weighed both your privacy rights and expectations against our rights, as well as the rights of our clientele, to effectively conduct our business. We've undertaken a thorough review of how your privacy might be affected by our data processing actions. Furthermore, we've conducted both a Balance Assessment to evaluate the effects on affected individuals and a Data Protection Impact Assessment to guarantee robust data safeguarding measures. These evaluations assist in ensuring that the data subjects' rights remain uncompromised and that such data processing is deemed appropriate.

5. SOURCE OF YOUR PERSONAL DATA

5.1. To deliver our services, we utilise various sources, encompassing public domain and social media platforms. Our strategy focuses on meticulously identifying business contacts for offers we deem relevant to them. We handpick representatives from businesses to ensure the offers sent are pertinent. When obtaining data from third-party entities, we ascertain their GDPR compliance, ensuring your rights remain safeguarded throughout

6. DATA SHARING

6.1. We typically do not sell or share your data with external companies, except when delivering our services or fulfilling our company obligations. As MiCAP Group Ltd specialises in prospecting and lead generation, when we collect your data for our service delivery, it is shared solely with the relevant client. In such instances, we honour your right to be informed and ensure you have the option to opt-out of marketing at the initial contact and in every subsequent communication. The client's privacy policy will provide their contact details, allowing you to exercise your rights whenever necessary.

6.2. Moreover, we might share your personal data with any entity within our group of companies (this encompasses our subsidiaries, our parent company, and all its subsidiaries, collectively referred to as "Group Companies"), but only as deemed reasonably necessary based on the purposes and legal foundations detailed in this policy.

6.3. Your personal data might also be shared with our insurers and/or professional advisors, but only when required for procuring or maintaining insurance coverage, risk management, seeking professional counsel, or for initiating, pursuing, or defending legal claims, be it through court or non-court procedures.

6.4. We may disclose your personal data to our suppliers, partners, and a select set of third parties as part of our operational requirements and service delivery. In such cases, we always ensure the presence of robust technical and administrative safeguards.

6.5. Naturally, beyond the specific data-sharing instances highlighted above, we might disclose your personal data when mandated by a binding legal obligation.

7. INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA

7.1. Please be aware that any personal data you choose to publish through our website or services could be accessible worldwide via the internet. We cannot control or prevent potential misuse of such data by third parties.

7.2. Our website includes links to third-party websites operated by other organisations. This privacy policy is pertinent only to our website and not to those third-party sites we link to. Each of these external websites will have its own privacy policies, and we do not take responsibility for their content or their privacy practices. Moreover, if you accessed our website from a third-party site, we cannot be held accountable for the privacy practices of that site's owners and operators. We advise you to review the privacy policy of any third-party site you visit.

8. HOLDING AND REMOVAL OF PERSONAL DATA

8.1. This segment details our procedures and policies regarding data retention. Our aim is to ensure adherence to legal requirements pertaining to the storage and removal of personal data. We will not retain personal data for longer than required for its intended purpose or purposes.

8.2. Despite the aforementioned points in this section, there might be instances where we need to retain your personal data to meet legal obligations. Alternatively, it could be essential to safeguard your critical interests or those of another individual.

9. COOKIES

9.1 By using our website and agreeing to this policy, you consent to our use of cookies, in accordance with the terms of our [insert link to cookie policy](#)

10. AUTOMATED PROCESSING

10.1 We might employ automated processes and decisions to confirm your contact information and assess if we should reach out to you for a promotional campaign representing our clients. This approach is solely to gauge if the campaign could be relevant to you and to authenticate your contact details.

11. DATA SUBJECTS' RIGHTS

11.1. This segment provides a brief overview of the rights you possess under data protection legislation. Given the intricacy of some rights, our summary might not encompass all specifics. Thus, for a comprehensive understanding, we recommend referring to the appropriate laws and directives provided by regulatory bodies.

11.2. Your principal rights under data protection law are:

11.2.1. The right to be informed

11.2.2. The right to access

11.2.3. The right to rectification

11.2.4. The right to erasure

11.2.5. The right to restrict processing

11.2.6. The right to object to processing

11.2.7. The right to data portability

11.2.8. Rights related to automated decision-making including profiling

11.2.9. The right to complain to a supervisory authority; and

11.2.10. The right to withdraw consent.

11.3. The Right to be Informed. This is the right of Data Subjects to know details regarding the processing of their data and how we acquired their data, this information is included in this Privacy Policy.

11.4. The Right to Access. You have the right to confirm as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data upon request and within one month of verification of your identity (we may extend the time within which we must provide the information by a further two months if the request is particularly complex, or if there are numerous requests and we will let you know if this is the case). The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

11.5. The Right to Rectification. You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed. If the request is accepted by us, the rectification will be completed within one month (may be extended by us by a further two months if complex). We will use all reasonable endeavours to notify any third party with whom we have shared the data of any rectifications made.

11.6. The Right to Erasure (also known as the "Right to be Forgotten"). In some circumstances you have the right to the erasure of your personal data without undue delay. However, there are exclusions to the right to erasure. We will use all reasonable endeavours to notify any third party with whom we have shared the data of any actioned erasure requests.

11.7. The Right to Restrict Processing. In some circumstances you have the right to restrict the processing of your personal data. Where processing has been restricted, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest. We will use all reasonable endeavours to notify any third party with whom we have shared the data of any restriction placed on the processing of your data.

11.8. The Right to Object to Processing. You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for certain tasks. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or if the processing is for the establishment, exercise or defence of legal claims.

11.9. The Right to Data Portability. To the extent that the legal basis for our processing of your personal data is:

a) consent; or

b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract; and

c) such processing is carried out by automated means.

You have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

11.10. Rights related to automated decision-making including profiling. We do not solely use automated decision making (including profiling) when processing your data, automated processing will be used to verify your contact details and determine if the campaign will be of interest to you. You have the right to object to decisions, should they be based purely on automated processing.

11.11. Right to Complain. If you consider that our processing of your personal information infringes data protection laws, you should first contact us. If you are dissatisfied with the outcome, you have a legal right to lodge a complaint with a Supervisory Authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

12. CONTACTING US CONCERNING THE CONTENTS OF THIS PRIVACY POLICY

12.1. If Your query relates to this Privacy Policy or should you wish to exercise one of Your Data Protection Rights as a Data Subject, you can contact us in the following ways:

By post to Our registered office: MiCAP Group Ltd

Building 18 Gateway 1000 Whittle Way, Arlington Business Park, Stevenage, Hertfordshire, England, SG1 2FP

By email at: insert email address: enquiries@micapgroup.com

12.2. If you remain unsatisfied by our response you may complain to the Information Commissioners offices at the following address:

Information Commissioner's Office:

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

or

www.ico.org.uk

13. AMENDMENTS TO THIS POLICY

13.1. We may update this policy from time to time by publishing a new version on our website.

13.2. You should check this page occasionally to ensure you are happy with any changes to this policy.

13.3. We may notify you of changes to this policy by email.

This policy was last updated on: 20.03.24