

WEBSITE PRIVACY POLICY

CONTENTS

VERSION CONTROL	2
QUICK OVERVIEW	3
1.0 INTRODUCTION	4
2.0 PURPOSE	4
3.0 SCOPE	4
4.0 INFORMATION COLLECTION, STORAGE AND USE	4
5.0 LAWFUL BASIS FOR PROCESSING	5
6.0 YOUR DATA PROTECTION RIGHTS	5
7.0 DATA RETENTION	6
8.0 COOKIES	6
9.0 CONTACTING US	7
10.0 REFERENCES AND ASSOCIATED DOCUMENTATION	7
11.0 MONITORING COMPLIANCE WITH, AND THE EFFECTIVENESS OF, PROCEDURAL DOCUMENTS	7

VERSION CONTROL

Version	Primary Editor	Reviewer	Changes made by reviewer	Approved by	Date
V0.03	Lauren Earl	Madeleine Milligan	General proof		17/04/20
V0.04		Andrew Moore	Partner Review		05/05/20
V0.05		Madeleine Milligan	Updates following Partner Review		12/05/20
V1.0		Madeleine Milligan	Final	Andrew Moore	12/05/20
V1.01		Ed Taylor	Address updated		17/05/22
V2.0		Lynne Smith	Version Control	Jane Stairmand	19/12/22
V2.01		Marielle Walmsley	Address updated		16/11/23
V2.02	Andrew Moore		Annual Review	Andrew Moore	19/02/24
V3.0	Marielle Walmsley		Policy owner updated	Jane Williams	01/05/24
V3.01	Annabelle Armstrong	Gordon Grant	Policy review and update Amended section 4.4 to reflect WebFlow as platform	Gordon Grant	04/02/25
V4.0	Annabelle Armstrong		Annual Review	Gordon Grant	04/02/25
V4.01	Annabelle Armstrong		Annual Review – updated company address & branding, formatting updated	Gordon Grant	
V4.02	Dan Sly		Update to references 9.1 amended Grammar reviewed		14/07/26
V5.0	Gordon Grant		Annual Review		31/07/26

QUICK OVERVIEW

For quick reference, the guide below is a summary of the document. This does not negate the need for the document author and all other members of staff to be aware of and follow the detail of this policy.

- Clarity are committed to safeguarding the privacy of our website visitors; this policy explains how we will treat your personal information.
- We have a framework of policies, procedures and training in place that covers data protection, confidentiality and security and we regularly review the appropriateness of the measures we have in place to keep the data we hold secure.

1.0 INTRODUCTION

- 1.1 Clarity Consulting Associates Ltd (hereafter referred to as “Clarity”) are committed to respecting and protecting the general public’s privacy.
- 1.2 We do not share, sell, rent or lease any personally identifiable information or data with anyone else for marketing purposes and we will always respect individuals’ preferences about how and if we contact them.
- 1.3 Personal data is any information relating to an identified or identifiable living person. When “you” or “your” are used in this policy, we are referring to the relevant individual who is the subject of the personal data.

We are compliant with the [Data Protection Act of 2018](#) and any subsequent amendments including the [Data \(use and access\) Act 2025](#) as outlined in our Data Protection (UKGDPR) Policy.
- 1.4 This policy is not contractual; Clarity therefore reserves the right to amend this policy as necessary to meet any changing requirements.

2.0 PURPOSE

- 2.1 This policy explains how Clarity uses the personal data collected from members of the public when they access and use our website (www.ccal.co.uk).

3.0 SCOPE

- 3.1 This policy applies only to our website; any links within our site to third party websites are not covered by this privacy policy.

4.0 INFORMATION COLLECTION, STORAGE AND USE

- 4.1 Clarity collects the following data from members of the public who interact with us through our website or directly:
 - Information about your computer and about your visits to and use of our website (including your IP address, geographical location, demographics, browser type and version, operating system, referral source, length of visit, page views and website behaviours);
 - Information that you provide to us when you interact with our website (which could include your email address, name, company and telephone number);
 - Any other personal information that you choose to send to us.
- 4.2 Personal information submitted to us through our website will only be used for the purposes specified in this policy, unless otherwise stated on relevant pages of the website.

4.3 Clarity may use your personal information to:

- Personalise our website for you;
- Send you non-marketing commercial communications;
- Send you email notifications that you have specifically requested;
- Send you our email newsletter (you can inform us at any time if you no longer want to receive our newsletter);
- Send you marketing communications relating to our business which Clarity think may be of interest to you, by post, email or phone (you can inform us at any time if you not want to receive our communications);
- Deal with enquiries and complaints made by or about you relating to our website;
- Keep our website secure and prevent fraud.

4.4 Our company is hosted on the WebFlow.com platform. WebFlow.com provides us with the online platform that allows us to market our products and services to you. Your data may be processed by trusted third-party service providers, including WebFlow.com (our website hosting platform) and analytics providers such as Google Analytics.

4.5 If you do not want us to process your data anymore, please contact us using the details stated in section 9.0 of this document.

5.0 LAWFUL BASIS FOR PROCESSING

Clarity processes personal data in accordance with applicable data protection laws. The lawful basis we rely on include:

- **Consent** – where you have given clear consent for us to process your personal data for a specific purpose (for example, subscribing to newsletters or accepting non-essential cookies);
- **Legitimate interests** – where processing is necessary for our legitimate interests, including improving our website, responding to enquiries and ensuring the security of our website, provided these interests are not overridden by your rights;
- **Legal obligations** – where processing is necessary for compliance with legal or regulatory requirements.

6.0 YOUR DATA PROTECTION RIGHTS

6.1 In line with our Data Protection (UKGDPR) Policy, Clarity would like to make sure you are fully aware of all your data protection rights. Every user is entitled to the following:

- The right to be informed;
- The right of access;
- The right to rectification;
- The right to erasure;
- The right to restrict processing;

- The right to data portability;
 - The right to object; and
 - The right not to be subject to automated decision-making, including profiling.
- 6.2 If you make a request relating to one of your data protection rights, Clarity will respond within one month of receipt. You can contact us using the details stated in Section 9.0 of this document.
- 6.3 If you are not satisfied with how we handle your personal data, you have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

7.0 DATA RETENTION

Clarity will only retain your personal data for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting or reporting requirements.

In general:

- Enquiry data will be retained for up to 12 months after the last contact;
- Marketing communication data will be retained until you opt out or withdraw your consent;
- Technical and analytics data will be retained in line with our analytics provider retention settings.

Where appropriate, we may retain data for longer periods where required to meet legal or regulatory obligations.

8.0 COOKIES

- 8.1 Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. When you visit our website, Clarity uses cookies in accordance with applicable laws.
- Strictly necessary cookies are set automatically to enable the website to function.
 - Non-essential cookies (including analytics cookies) will only be placed on your device if you provide your consent via our cookie consent tool when you first visit the website. You can withdraw or manage your consent at any time through the cookie settings on our website.
- 8.2 In general, Clarity use cookies and our records of the pages you have visited to gather information about all of our customers collectively. We only use such data in the aggregate. This information helps us determine what is most beneficial for our customers, and how we can continually create a better overall experience for you and improve our website in order to tailor it to your needs.
- 8.3 Specifically, our website is supported by Google Analytics which uses cookies that are not controlled by us. These cookies recognise and count the number of visitors and to see how those visitors interact with the website.
- 8.4 You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that you may not be able to access the full functionalities of our website.

- 8.5 The table below provides examples of cookies that may be used on our website. Cookie usage may change over time depending on our website platform and services in use.

Name	Purpose	Duration
XSRF-TOKEN	For security purposes (Used by Webflow.com)	Session
wf-csrf		
Wf-session	Identifies unique visitors and tracks a visitor's sessions on a site (used by Webflow.com)	2 years
_ga	Used to collect information about how visitors use our site (Used by Google Analytics).	2 years
_gat		
gid		
AWSELBCORS	ID Load Balancer	1 year
JSESSIONID	Session Tracking	Session

9.0 CONTACTING US

- 9.1 If you have any questions about Clarity's privacy policy, the data we hold on you, or you would like to exercise your data protection rights, please do not hesitate to contact our Data Controller at datacontroller@ccal.co.uk or send us mail to: 5th Floor, Kings House, 174 Hammersmith Road, London W6 7JP. If you are still unsure or dissatisfied with our response you may contact the ICO, please refer to 6.3.

10.0 REFERENCES AND ASSOCIATED DOCUMENTATION

Data Protection (UKGDPR) Policy – available on our website, or upon request to the Data Controller (datacontroller@ccal.co.uk).

[Data Protection Act of 2018](#)

[Data \(use and access\) Act 2025](#)

11.0 MONITORING COMPLIANCE WITH, AND THE EFFECTIVENESS OF, PROCEDURAL DOCUMENTS

This policy will be reviewed on at least an annual basis by Clarity's senior team, or earlier if appropriate/required.