

## The ODD Company

### GDPR - Privacy Notice

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#### The ODD Company\*

\*The ODD Company is the registered trading name of The ODD Consulting Company Limited and The ODD Consulting Company (UK) Limited. **Email:** [info@theoddcompany.ie](mailto:info@theoddcompany.ie) **Website:** [www.theoddcompany.ie](http://www.theoddcompany.ie)

#### Ireland

G2 Riverview Business Park, Nangor Road, Dublin 12  
**Registered Address:** Century House, Harold's Cross Road,  
Dublin 6W, Ireland  
**Reg No:** 499251 **Directors:** Dr Simon Mac Rory (CEO) T.J.  
Byrne (Director)  
**Tel:** +353 1 662 7861

#### United Kingdom

Hill House, 210 Upper Richmond Road, London SW15 2NP  
**Registered Address:** 19, Portland Place, London W1B 1PX  
**Reg No:** 7711198 **Directors:** Dr Simon Mac Rory  
**Tel:** +44 20 8789 6657

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## Privacy Notice

We understand that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers, contractors and contacts and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

### 1. Information About Us

Company: The ODD Company

Data protection lead: Dr. Simon Mac Rory

Email address: [info@theoddcompany.ie](mailto:info@theoddcompany.ie)

UK Address: Hill House, 210 Upper Richmond Road, London SW15 6NP

UK Telephone: +44 20 8789 6657

Ireland Address: G2 Riverview Business Park, Nangor Road, Dublin 12, Ireland

Ireland Telephone: +353 1 662 7861

### 2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

### 3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

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#### 4. **What Are My Rights?**

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases. We do not use your personal data in this way.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

#### 5. **What Personal Data Do You Collect?**

We may collect some or all of the following personal data. If you do not allow us to collect this data then we may not be able to fulfil our contractual or legal requirements.

- Name
  - Address
  - Email address
  - Telephone number
  - Business name
  - Job title
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- Profession
- Personality information
- Payment information
- IP address and website cookies

## 6. **How Do You Use My Personal Data?**

Under the GDPR, we must always have a lawful basis for using personal data. Our lawful basis is one or more of the following:

- Because the data is necessary for our performance of a contract with you;
- Because you have consented to our use of your personal data; or
- Because it is a legal requirement.

Your personal data may be used for one of the following purposes:

- Providing and managing your account.
- Supplying our services to you. Your personal details are required in order for us to enter into a contract with you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information that you have opted-in to (you may unsubscribe or opt-out at any time by following the instructions at the bottom of every communication).
- With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

## 7. **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- If you make an enquiry but do not engage our services, we will keep your personal data for 3 months from the date of last communication.
- If you engage our services, we will keep your personal data for 7 years from the date of last communication.

## 8. **How and Where Do You Store or Transfer My Personal Data?**

We may store or transfer some or all of your personal data in countries that are not part of the

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European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR as follows:

- Where we transfer your data to a third country, this is protected by the use of a data sharing agreement utilising EU approved model contract clauses, or the EU-US Privacy Shield.

## 9. **Do You Share My Personal Data?**

We may need to share your personal data with the following recipients:

- Cloud services providers
- External accountant
- Contractors working on our behalf
- Couriers making deliveries on our behalf

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## 10. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 11. **How Do I Contact You?**

To contact us regarding your personal data and data protection, including to make a subject access request, please use the contact details in section 1.

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## 12. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available in the latest version of this document, which is always available from our website.

## **Document Owner and Approval**

The data protection lead is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

