



# ACACIA LIMITED

## Privacy Notice (Last updated 20/06/2023)

**Your privacy** is very important for us. As a result, we have developed this Privacy Notice for Acacia Limited (“Company”, “we”, “us” or “our”) which describes how and why we might collect, store, use and/or share (“process”) your personal information (“Information”) when you choose to interact with us or use our services, such as when you:

- Enquire about the services we provide or any other enquiry, whether directly or through our website;
- engage us to provide various types of consultancy and/or associated administrative services;
- apply to follow a training course we deliver.

### Our contact details

**Name:** Acacia Limited (“Acacia”)  
**Address:** Lon Carle, Les Ruisseaux, St Brelade, JE3 8DD, Jersey  
**Phone Number:** +44 7797 751056  
**E-Mail:** [info@acacia.ie](mailto:info@acacia.ie)

### What type of information we have

We currently collect and process the following information:

<b>Personal identifiers</b>	contacts and characteristics (for example, name and contact details).
<b>Professional or employment related information</b>	contacts and characteristics (for example business contact details).
<b>Commercial information</b>	Transaction information, purchase history, financial details, and payment information.
<b>Audio, electronic, visual, or similar information</b>	Images and audio, video or call recordings created in connection with our business activities.

### How we get the information and why we have it

Most of the Information we process is provided to us directly by you for one of the following reasons:

- to respond to your enquiries
- to provide consultancy and administrative services
- to carry out various administrative tasks in relation to our services
- to facilitate the delivery of training to you
- to request feedback so as to improve our service and delivery
- to manage relationships with our suppliers
  
- to improve user experience on our website and to create aggregated statistical data and other aggregated and/or inferred non-personal Information, which we may use to provide and improve our services;

Under the Data Protection (Jersey) Law 2018 (the “Data Protection Law”), the lawful bases we rely on for processing this information are:

- A. **Your consent.** You are able to remove your consent at any time. You can do this by contacting: [info@acacia.je](mailto:info@acacia.je)
- B. **We have a contractual obligation.** We may process your Information when we believe it is necessary to fulfil our contractual obligations to you, including providing our services or at your request prior to entering into a contract.
- C. **We have a legitimate interest.** We may process your Information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your Information for understanding how satisfied you are with the quality of our services.
- D. **We have a legal obligation.** We may process your Information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights.

In legal terms, we are generally the “data controller”, under the Data Protection Law, of the personal information described in this privacy notice, since we determine the means and/or purposes of the data processing we perform. This privacy notice does not apply to the Information we process as a “data processor” on behalf of our customers. In those situations, the customer that we provide services to and with whom we have entered into a data processing agreement is the “data controller” responsible for your personal information, and we merely process your information on their behalf in accordance with your instructions. If you want to know more about our customers’ privacy practices, you should read their privacy policies and direct any questions you have to them.

## What we do with the information we have

We use the information that you have given us in order to:

- **respond to your enquiries:** we may process your Information to send you information in response to your enquiry whether for our services or other matter;
- **provide consultancy and administrative services:** we may process your Information in order to provide you with the appropriate guidance, including sending your different reports, analysis or other documents;
- **to carry out various administrative tasks in relation to our services:** we may process your Information in order to send you information or documents e.g. invoices in relation to our services.
- **facilitate the delivery of training to you:** we may process your Information to carry out various administrative tasks in relation to the delivery of training, such as sending you materials and also to obtain the relevant accreditation on your behalf where relevant;
- **request feedback:** we may process your Information when we ask for your feedback in respect of the services we have provided so as to improve our services;
- **manage relationships with our suppliers:** we may process your Information in order to pay for your products/ services and contact you (our supplier) in relation to the services or products you supply us;
- **to improve user experience on our website and to create aggregated statistical data and other aggregated and/or inferred non-personal Information, which we may use to provide and improve our services;**

**We will never sell your information or pass it to any third party for marketing purposes or for any other purpose unconnected with our business.**

We may share this information with:

- other organisations when required in order to obtain a specific accreditation in relation to the training course we have delivered to you;
- third parties with whom we engage for the hosting of training sessions or other events;
- Law enforcement agencies where considered necessary for us to fulfil legal obligations applicable to it;
- Regulators or other governmental or supervisory bodies with a legal right to the material or a legitimate interest in any material.

## How we store your information

Acacia has appointed Google Cloud EMEA Limited as a processor in order to provide the infrastructure to process and store your information. Your information is securely stored in the cloud, limited to Google data centres in Europe, in the Acacia.je domain on Google Workspace, which has been designed to meet stringent privacy and security standards based on industry best practices. Further information is available at [https://workspace.google.com/security/?secure-by-design\\_activeEl=data-centers](https://workspace.google.com/security/?secure-by-design_activeEl=data-centers).

Access to the Acacia Google Workspace is protected by appropriate technical and organisational measures.

Acacia has appointed Pandle as a processor in order to provide accounting software services. In this context, a personal email address may be saved to which we will send an invoice in relation to the services we have provided. All passwords and any personally identifiable data are stored on disk (in [Pandle's] database) using industry-standard encryption algorithms. Further information is available at <https://support.pandle.com/en/articles/2033623-how-secure-is-pandle-how-safe-is-my-data-and-where-is-it-kept>

Acacia has appointed Wix.com Ltd as a processor in order to provide website hosting services. In this context, subject to your consent, non personal information will be saved for statistical purposes. Further information is available at <https://www.wix.com/about/privacy-dpa-users>. Please also read the section below on the use of cookies.

We keep all types of Information as described above, for the duration of our engagement to provide you with services we have agreed and subsequently it is retained for 2 (two) years from the end of the contract, unless included on a document which we are legally required to keep for a specific period of time. All information collected and processed outside of a service engagement is maintained for 1 (one) year from the date it was last processed or from the date that you had consented for us to maintain your Information.

We may keep audio or video recordings for longer when using as an example in a training course, subject to having received your consent to do so.

We will then dispose of your Information by deleting all relevant digital and physical files.

## Your data protection rights

Under data protection law, you have rights including:

<b>Your right of access</b>	You have the right to ask us for copies of your personal information
<b>Your right to rectification</b>	You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
<b>Your right to erasure</b>	You have the right to ask us to erase your personal information in certain circumstances.
<b>Your right to restriction of processing</b>	You have the right to ask us to restrict the processing of your information in certain circumstances.
<b>Your right to object to processing</b>	You have the right to object to the processing of your personal data in certain circumstances
<b>Your right to data portability</b>	You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances

You are not required to pay any charge for exercising your rights. If you make a request, we have four weeks to respond to you. Please contact us at: [info@acacia.je](mailto:info@acacia.je) if you wish to make a request.

## Use of Cookies

Our website [www.acacia.je] uses cookies. A cookie is a small file of letters and numbers the website puts on your device if you allow it. These cookies recognise when your device has visited our website(s) before, so we can distinguish you from other users of the website. This improves your experience and our website. We do not use cookies to identify you, just to improve your experience on our website and to produce viewing statistics. If you do not wish to use the cookies, you can amend the settings on your internet browser so it will not automatically download cookies. However, if you remove or block cookies on your computer, please be aware that your browsing experience and our website's functionality may be affected.

You can allow or block the use of cookies by default through your browser. The following links provide instructions for the main browsers:

- [Cookie settings in Firefox](#)
- [Cookie settings in Internet Explorer](#)
- [Cookie settings in Google Chrome](#)
- [Cookie settings in Safari \(OS X\)](#)
- [Cookie settings in Safari \(iOS\)](#)
- [Cookie settings in Android](#)

If you would like to know more about cookies please consult the following website: <https://allaboutcookies.org/>

When you visit our website you will first be informed of the use of cookies and asked whether you approve of the use of non-essential cookies when viewing our website. At this point you can choose to reject the use of cookies.

## **Privacy Policy Updates**

We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.

## **How to complain**

You can also complain to the Jersey Office of the Information Commissioner (**JOIC**) if you are unhappy with how we have used your personal data.

### **JOIC's address:**

2nd Floor  
5 Castle Street  
St. Helier  
Jersey  
JE2 3BT

[enquiries@jerseyoic.org](mailto:enquiries@jerseyoic.org)  
T+44 (0) 1534 716530

