

## PRIVACY POLICY

### Introduction

We take your privacy very seriously and we are committed to protecting your personal data. Please read this privacy policy carefully as it contains important information on how and why we collect, store, use, and share any information relating to you (your **personal data**) in connection with your use of our website and when we provide immigration advice services to you (our **services**). It also explains your rights in relation to your personal data and how to contact us or a relevant regulator in the event you have a complaint. This privacy policy supplements other notices and privacy policies and is not intended to override them.

We collect, store, use and share your personal data and when we do so we are subject to General Data Protection Regulation (EU) 2016/679, as it forms part of domestic law in the United Kingdom by virtue of section 3 of the European Union (Withdrawal) Act 2018 (including as further amended or modified by the laws of the United Kingdom or of a part of the United Kingdom from time to time) (**UK GDPR**), the **Data Protection Act 2018**, and The Privacy and Electronic Communications (EC Directive) Regulations 2003 (as amended or modified by the laws of the United Kingdom) (**PECR**).

### Key Terms

We, us, our	<b>No Going Back</b> , the trading name of <b>Pride Immigration Ltd.</b>
Our data privacy manager	Mr Stuart Hanson
Address	No Going Back, 64 Hall Lane, Armley, Leeds, LS12 2LH.
Personal data	Any information relating to an identified or identifiable individual.

Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, genetic data, biometric data (where used for identification purposes), data concerning health, sex life or sexual orientation.
Data subject	The individual who the personal data relates to.

Our website [www.nogoinback.org.uk](http://www.nogoinback.org.uk) is provided by us, No Going Back which is the trading name of **Pride Immigration Ltd** and is the controller responsible for your personal data (collectively referred to as "**No Going Back**", "**we**", "**us**" or "**our**" in this privacy policy).

### **Changes to the privacy policy and your duty to inform us of changes**

This website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

We keep our privacy policy under regular review and therefore we may change this privacy policy from time-to-time – when we do we will inform you by publishing the policy on our website.

It is important that the personal data we hold about you is accurate and current. We ask that you keep us informed if your personal data changes during your relationship with us.

## Personal data we collect about you

We may collect, use, store, and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender;
- **Contact Data** includes billing address, delivery address, email address and telephone numbers;
- **Financial Data** includes bank account and payment card details;
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website;
- **Usage Data** includes information about how you use our website, products, and services; and
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

**Special Categories of Personal Data** when such is disclosed by you to us in the provision of our services to you, or by a third person or third-party organisation, including:

- details about your **race or ethnicity**, and **information about your health**.

We require your consent to record, process, store, and transfer **Special Categories of Personal Data**. If you do not give your consent for us to record this information, or we are unable to obtain your consent we will be unable to provide our services to you.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with immigration advice services). In this case, we may have to cancel the immigration advice services, but we will notify you if this is the case at the time.

### **How is your personal data collected?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms on our website or by corresponding with us by post, phone, email, FaceTime or WhatsApp. This includes personal data you provide when you:
  - Complete forms on our website or sign up to a course that we offer;
  - discuss with us your immigration advice needs via telephone and email;
  - subscribe to our service or publications; and
  - give us feedback or contact us.
- **Indirect interaction.** We may receive your Identity and Contact Data when it is disclosed to us by a third party.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy for further details.

### **How and why we use your personal data**

Under data protection law, we can only use your personal data if we have a proper reason, for example:

- Where we have obtained your consent.

- Where we need to perform the contract we enter into with you, to allow us to provide services to you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

The table below explains what we use your personal data for and why. Please note that we may process your personal data for more than one reason depending on the specific purpose for which we are using your personal data.

<b>Purpose/Activity</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
Providing services to you	To perform our contract with you or to take steps at your request before entering into a contract
<b>Purpose/Activity</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To share your personal data with third parties where the sharing is required in order to provide the services to you	To perform our contract with you or to take steps at your request before entering into a contract
Conducting checks to identify you and verify your identity and other activities necessary to comply with professional, legal, and regulatory obligations that apply to our business	To comply with our legal and regulatory obligations

<p>To enforce legal rights or defend or partake in legal proceedings</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>— to comply with our legal and regulatory obligations;</li> <li>— in other cases, for our legitimate interests, i.e. to protect our business, interests, and rights</li> </ul>
<p>Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies and our professional advisers</p>	<p>To comply with our legal and regulatory obligations</p>
<p>Ensuring business policies are adhered to, e.g., policies covering security and internet use</p>	<p>For our legitimate interests, i.e., to make sure we are following our own internal procedures so we can deliver the best service to you</p>
<p>Operational reasons, such as maintaining records, improving efficiency, training, quality control and managing our staff</p>	<p>For our legitimate interests, i.e., to be as efficient as we can so we can deliver the best service to you at the best price</p>
<p>Ensuring the confidentiality of sensitive information</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>— for our legitimate interests, i.e. to protect trade secrets and other commercially valuable information;</li> <li>— to comply with our legal and regulatory obligations</li> </ul>

<p>Statistical analysis to help us manage our business, e.g., in relation to the provision of services to you</p>	<p>For our legitimate interests, i.e., to be as efficient as we can so we can deliver the best service to you at the best price</p>
<p>Preventing unauthorised access and modifications to systems</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>— for our legitimate interests, i.e., to prevent and detect criminal activity that could be damaging for you and/or us;</li> <li>— to comply with our legal and regulatory obligations</li> </ul>
<p><b>Purpose/Activity</b></p>	<p><b>Lawful basis for processing including basis of legitimate interest</b></p>
<p>Protecting the security of systems and data used to provide the services</p>	<p>To comply with our legal and regulatory obligations</p> <p>We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests, i.e. to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us</p>
<p>Updating and enhancing your records</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>— to perform our services to you with you or to take steps at your request</li> </ul>

	<p>before entering into a contract for our services;</p> <ul style="list-style-type: none"> <li>— to comply with our legal and regulatory obligations;</li> <li>— for our legitimate interests, e.g., making sure that we can keep in touch with our customers about existing orders and new products</li> </ul>
<p>Statutory returns</p>	<p>To comply with our legal and regulatory obligations</p>
<p>Ensuring safe working practices, staff administration and assessments</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>— to comply with our legal and regulatory obligations;</li> <li>— for our legitimate interests, e.g., to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you</li> </ul>
<p>Preventing and detecting fraud against you or us</p>	<p>For our legitimate interest, i.e., to minimise fraud that could be damaging for you and/or us</p>



## Children

We do not knowingly collect or process personal data about children. If you are aware that we have collected children's data, or you have disclosed such to us, please contact us so that we may investigate.

## Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## Disclosures of your personal data

We may share your personal data with the **External Third Parties** as set out in the **Glossary** for the purposes set out above.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## How long your personal data will be kept

We will not keep your personal data for longer than we need it for the purpose for which it is used. In any event, we shall not store your personal data for longer than 6 years, unless we are compelled to do so by data privacy laws, other legal and statutory instrument, or as directed by a regulatory body.

Following the end of the of the relevant retention period, we will delete or anonymise your personal data.

### **International Transfers**

We do not transfer your personal data outside the UK. We may engage with third parties who transfer your personal data outside of the UK, through your use of our website. Where we engage with third parties who may transfer your personal data outside of the UK, we ensure that they implement appropriate safeguards to protect your individual rights and ensure the security of your personal data.

### **Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. We have put in place procedures to deal with any suspected personal data breach and will notify you and the applicable regulator of a breach where we are legally required to do so.

## GLOSSARY

### Lawful basis

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

### External Third Parties

We do not routinely share personal data with an external third parties, however, where we have an obligation to do so we may share personal data with:

- The Office of the Immigration Services Commissioner (OISC) who regulates professional that provide immigration advice regarding UK immigration law; and

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - If you want us to establish the data's accuracy.
  - Where our use of the data is unlawful, but you do not want us to erase it.
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
  - You have objected to our use of your personal data, but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right

only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

### How to contact us

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

**Full name:** Mr Stuart Hanson

**Address:** No Going Back, 64 Hall Lane, Armley, Leeds, LS12 2LH

**Email:** [stuart@nogoingback.org.uk](mailto:stuart@nogoingback.org.uk)

You have the right to make a complaint at any time to the Information Commissioner's Office (the "ICO"), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.