

Website Privacy Notice

1. Introduction

This privacy notice explains how we collect, use, and protect your personal data when you visit or interact with our website. It also outlines your rights under data protection law.

By using our website and submitting your personal data, you confirm that you are at least 13 years of age.

We act as the “data controller” for the personal data we collect through this website. This means we are responsible for determining how your personal data is used and for ensuring it is handled in compliance with applicable data protection legislation.

We have appointed a Privacy Manager to oversee all matters relating to this privacy notice. If you have any questions, concerns, or requests regarding your personal data, please contact our Privacy Manager using the details provided below.

Contact Details

Privacy Manager: Mr. David Power

Postal address: Kings House, 3rd Floor, Kymberley Road, Harrow, HA1 1PT.

Telephone number: 0208 452 4286

Privacy-related enquiries, requests and data protection complaints can be raised using the contact details above. Where a complaint is made by telephone, we will explain how the complaint will be recorded and handled under our data protection complaints process.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by calling the above number.

2. What Data Do We Collect About You, For What Purpose and on What Ground We Process It

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process the following categories of personal data about you:

- **Communication Data** that includes any communication that you send to us, whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests, which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.
- **Individuals or Service Users Data**, such as your name, title, address, email address, phone number, contact details and bank details, are used to supply a service to you. Please note that the above list of categories of personal data is not exhaustive. We will only collect and process personal data where we have a lawful basis for doing so and where it is relevant to our relationship or interaction with you.
- **User Data** includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain backups of our website and/or databases and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests, which in this case are to enable us to properly administer our website and our business.

- **Technical Data** that includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data may include analytics tools, website logs, cookies and similar technologies. We process this data to analyse website use, administer and protect our business and website, understand the effectiveness of our communications and marketing, and improve our website and services. Our lawful ground for this processing is our legitimate interests, where this is permitted by law. Where cookies or similar technologies require consent, we will obtain consent through our cookie banner or cookie settings tool before setting those cookies.

We may use Individuals or Service Users Data, User Data and Technical Data to deliver relevant website content, measure the effectiveness of our website and communications, and, where applicable, deliver or measure advertising. Where we use cookies or similar technologies for analytics, advertising or tracking purposes, we will obtain consent where required through our cookie banner or cookie settings tool. Our lawful ground for related processing is our legitimate interests or consent, depending on the nature of the processing and applicable legal requirements.

Sensitive Data

We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

Where we are required to collect personal data by law, or under the terms of the contract between us, and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered, but if we do, we will notify you at the time.

We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this, please get in contact with us. In case we need to use your details for an unrelated new purpose, we will let you know and explain the legal grounds for processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

3. How We Collect Your Personal Data

We may collect data about you by you providing the data directly to us (for example by filling in forms on our site or by sending us emails)

We may automatically collect certain data from you as you use our website by using cookies and similar technologies. Please see our cookie policy for more details about this.

We may also receive personal data about you from our clients, third parties or other sources.

We may also receive data from publicly available sources, such as Companies House, the Electoral Register and other publicly available registers or sources, where permitted by law.

4. Marketing Communications

Our lawful ground for processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely, to grow our business). Where we rely on consent for marketing or cookies, you can withdraw your consent at any time.

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if (i) you made a purchase or asked for information from us about our goods or services or (ii) you agreed to receive marketing

communications, and in each case, you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However, you can still opt out of receiving marketing emails from us at any time.

Before we share your personal data with any third party for their own marketing purposes, we will get your express consent.

You can ask us to stop sending you marketing messages at any time by calling our office.

If you opt out of receiving marketing communications, this opt-out does not apply to personal data provided as a result of other services.

5. Disclosures Of Your Personal Data

We may have to share your personal data with the parties listed below:

- Other companies in our group and related companies who provide services to us.
- Service providers who provide IT and system administration services.
- Clients to enable them to validate our adherence to our contractual obligations and to assist them with any compliance or legal matters.
- Professional advisers including lawyers, bankers, auditors and insurers
- Government bodies that require us to report processing activities.
- Tax, audit, or other authorities, when we believe in good faith that the law or other regulation requires us to share this data (for example, because of a request by a tax authority or in connection with any anticipated litigation).
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We may send your information to Clients in order to demonstrate our compliance processes are correct. This includes information in your file to ensure you are engaged correctly with our business. This also includes any call logs to demonstrate that your registration and status have been evaluated correctly and that information on contracting opportunities is in accordance with our terms of business.

Where required, we may also share your personal data with our client (and their advisors) in relation to any requests necessary to deal with any challenges as regards to your contractual and employment status; this includes sharing information in regards to HMRC and Employment Tribunal issues.

We may have to share your personal data with third parties, including third-party service providers, for example, because it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. Third-party providers may carry out the following services: accounting and payroll, pension administration, benefits provision and administration, IT services.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

6. International Transfers

Some of our third-party service providers may be located outside the United Kingdom. Where your personal data is transferred outside the UK, we will ensure that appropriate protections are in place in accordance with applicable data protection laws. This may include:

- transfers to countries or organisations covered by UK adequacy regulations;
- use of the UK International Data Transfer Agreement;
- use of the UK Addendum to the EU Standard Contractual Clauses; or
- other appropriate safeguards permitted under UK data protection law.

Where required, we will provide further information about the transfer and the safeguards used.

7. Data Security

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions, and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

8. Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes, the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your Legal Rights

Under data protection laws, you have rights in relation to your personal data. These may include the right to request access to your personal data, request correction or erasure, request restriction of processing, object to processing, request data portability, and withdraw consent where we rely on consent as our lawful basis.

If you withdraw your consent, this will not affect the lawfulness of any processing carried out before your withdrawal.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please get in contact with us. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

10. Data Protection Complaints

If you have a concern about how we collect, use, store, share, retain, delete or otherwise process your personal data, you can raise a data protection complaint with us using the contact details set out in this notice.

A data protection complaint does not need to be raised formally or use legal terminology. Any concern about the handling of personal data will be treated as a potential data protection complaint.

We will acknowledge receipt of any data protection complaint within 30 days of receiving it. We will take appropriate steps to respond without undue delay, including making appropriate enquiries, keeping you informed where appropriate, and communicating the outcome without undue delay.

Where you remain dissatisfied, you have the right to complain to the Information Commissioner's Office, the UK supervisory authority for data protection issues. The ICO can be contacted at www.ico.org.uk or by phone on 0303 123 1113.

11. Third-Party Links

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 notice of every website you visit.

12. Cookies

Our website uses cookies and similar technologies. Some cookies are strictly necessary for the website to function properly. Non-essential cookies, such as analytics, performance, functionality or targeting cookies, will only be set where you have provided consent through our cookie banner or cookie settings tool.

You can change or withdraw your cookie preferences at any time using the cookie banner or cookie settings tool. You can also set your browser to refuse all or some browser cookies, although this may affect the operation of the website.

For more information about the cookies we use, please see our Cookie Policy.

13. Policy Review and Updates

We review this Privacy Notice regularly to ensure it remains accurate and up to date with current legal requirements and our data processing practices.

Signed: David Power



Capacity: Director

Date: 13/08/2026