

Phil Burton (EA) Ltd
Website Privacy Notice

The Purpose of this privacy notice is to explain how Phil Burton EA Ltd processes personal data to fulfil its data protection responsibilities. The notice covers the activities of the company, referred to hereafter as PBEA, by its staff. It is primarily directed at the company's clients, but its scope also includes suppliers and contractors.

The Role of PBEA in data protection terms is that of a data controller where it determines the purpose and use of personal data collected and is registered with the Information Commissioner's Office (ICO). Once your data has been received it becomes the responsibility of the privacy manager (PM) to ensure that it is processed in accordance with the latest UK data protection legislation. You can contact the PM via email using privacy@phillipburton.com.

The personal data processed by PBEA be basic contact information for the purposes of responding to general enquiries, business development, setting up invoices and enrolling you onto an Ascentiv programme (but only if appropriate). If we are not given all the required personal data, it may result in an incomplete service being provided.

PBEA's duty of confidentiality means that our staff will treat your personal data with due respect and in confidence and will only disclose it to those that need to know it (see below). We also expect the same duty of confidentiality of all third parties with whom we share personal data. Sharing is kept to a minimum and reviewed regularly. PBEA commits fellow consultants to data sharing agreements and data processing agreements where they are needed. Personal data, including back-ups, are processed in the UK.

We process personal data against a lawful basis as described below:

- To comply with our legal obligations
- To fulfil our contractual obligations to our clients
- To respond to enquiries and to promote our services, we will process your personal data in support of our legitimate interests where contractual arrangements are not in place
- When processing for a pre-defined purpose for which your consent has been sought prior to that processing commencing (consent may be withdrawn at any time via the PM)

In all cases the processing of your personal data by PBEA shall be in accordance with the principles of data protection, as set out in the UK data protection legislation.

PBEA will share personal data only when necessary, with some or all of the following:

- Other industry sector specialists subject to a data sharing agreement
- An IT support company that is subject to a data processing agreement
- A Sales support company that is subject to a data processing agreement
- Unspecified recipients but only when compelled to do so for legal reasons

PBEA follows a retention schedule to determine the length of time it holds different types of personal data. The retention schedule is shown below:

- Routine correspondence for casual enquiries in hard copy or in emails will be stored for 6 months after our last contact with you
- Contact data is stored indefinitely unless a valid request to erasure is received from the interested data subject
- Financial records and invoices, which may include personal data, will be retained for 6 years after the end of the current tax year of processing
- By exception, documentation that includes personal data may be retained by PBEA beyond the

schedule, but only for a specific purpose and only when PBEA believes there is a legitimate interest or a legal obligation to do so

At the end of the retention schedule PBEA will either destroy or delete your personal data and any associated emails or relevant documentation. If it is technically impractical to delete them, it will put it beyond operational use. It should be noted that PBEA allows up to 3 months after the retention schedule to complete the action.

The website uses cookies, but you have the option to enable the non-essential cookies as well as turn them off again later. For more details, please read the separate cookie statement.

The website has links to other websites that may be of interest to you, but please note that PBEA is not responsible for the processing of personal data by these websites.

The UK General Data Protection Regulation defines the rights that you have, although these do not apply in all situations - for convenience these are shown below:

- Right to be informed as to how your personal data is being processed by PBEA – this is done through this privacy notice or specific to client privacy notices issued separately
- Right to access your personal data held by us; this is done by making a 'Data Subject Access Request' (DSAR) to the PM
- Right to rectification of your personal data if you believe we have collected it incorrectly or it needs to be updated
- Right to erasure of your personal data for which we no longer have a legitimate purpose to process
- Right to restrict processing under certain circumstances, during which time your personal data but will be out of operational use until the related matter is resolved
- Right to data portability of your personal data in a machine-readable version, as you have provided, but this is only applicable to data provided with your consent or under contract
- Right to object to our processing of your personal data for which it does not have a legal or contractual obligation
- Rights related to automated decision making and profiling (however PBEA does not use these techniques in its decision making)

Further details on your data protection rights and all other aspects of the processing personal data, can be found on the Information Commissioner's Office (ICO) website: <https://ico.org.uk>.

Raising concerns, exercising rights or making queries about how we are processing your personal data can be done by contacting the PM. Please be aware that we will need to verify your identity before responding fully, therefore, you may be asked for material that, in context, will enable us to confirm it. Alternatively, you have the right to contact the ICO directly.

v1.0
April 2022

To be reviewed in April 2023 by Mr Phillip Burton