

## **Privacy Policy**

Maintaining data privacy and data protection is a priority for Phoenix ME Ltd. This privacy policy provides the basis on which we will process any personal data we collect from you, or that you provide to us, when you visit our website at phoenixme.co.uk

This website is not intended for children and we do not knowingly collect data relating to children.

Please read this Privacy Policy carefully to understand our views and practices regarding your Personal Data and how we will treat it.

Phoenix ME Ltd is the data controller and is responsible for your personal data (collectively referred to as “Company”, “we”, “us” or “our” in this policy).

### **1. Contact details**

We have appointed a data privacy manager. If you have any questions about this privacy policy please contact them using the details set out below.

Email: [GDPR@phoenixme.co.uk](mailto:GDPR@phoenixme.co.uk)

Phoenix ME Ltd, 1<sup>st</sup> floor, 25 Camperdown St, London E1 8DZ

You have the right to make a complaint at any time to the Information Commissioner’s office (ICO), the regulator for data protection issues.

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

We keep our privacy policy under regular review.

This version was last updated on March 2025. It may change and if it does, these changes will be posted on this page. The new policy may be displayed on-screen and you may be required to read and accept the changes to continue your use of the website.

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

### **3. Third party links**

vThis website may contain links to and from the websites of our partner networks, advertisers and affiliates. Please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these third-party websites or services, such as contact and location data. Please check these policies before you submit any personal data to these third-party websites or use their services.

### **3. The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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

Identity Data: first name, last name, and any other identifiers (such as social media handle) that you provide to us via our website forms, chat, social media or when you contact us.

Contact Data: address, email address and telephone numbers.

Device Data: includes the type of computer, tablet or mobile device you use, a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), IP address, mobile network information, your mobile or computer operating system, the type of mobile or web browser you use, browser plug-in types and versions, time zone setting and other technology on the devices you use to access this website.

Content Data: any content that you provide to us, for example via our chatbot on the website.

Usage Data: includes details of your use of our website including, traffic data, data about your communications with us, and data that logs how you browse the website.

Marketing and Communications Data: includes your preferences in receiving marketing from us and our third parties and your communication preferences.

Location Data: includes your current location disclosed by GPS technology.

Profile Data: includes your interests, preferences, feedback and survey responses.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose.

Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. It is data that relates to you that is combined with data relating to other users in a way that does not identify any individual user. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website page.

However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

#### **4. Special categories of Personal Data**

Under data protection law, there are Special Categories of Personal Data (this 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 Special Categories of Personal Data, or any information about criminal convictions and offences from our website visitors.

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

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

Information you give us. This is information (including Identity, Contact, Content, and Marketing and Communications Data) you consent to giving us about you by filling in forms on our website, or by corresponding with us (for example, by email, chat or phone, or via social media). If you contact us, we will keep a record of that correspondence.

Information we collect about your use of our website. As you browse our website, we will automatically collect personal data including Device and Usage Data. We collect this data using cookies and other similar technologies. Please see our Cookie Policy for further details.

Information we receive from third party sources. We will receive personal data about you from third parties as set out below:

Device, Profile and Location Data from analytics providers such as Google, Zoho and LinkedIn based outside the UK; and

Device and Identity Data from cookie software providers such as x based inside the UK.

## 6. Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/ Activity	Type of data	Lawful basis for processing
To give you access to, and use of our website	Identity Contact Device Location	Your consent Performance of a contract with you
To manage our relationship with you including notifying you of changes to this privacy notice or responding to you when you contact us.	Identity Contact Marketing and communications	Your consent Performance of a contract with you Necessary to comply with legal obligations (to inform you of changes to our terms and conditions)
To enable you to participate in or leave feedback	Identity Contact Device Profile Marketing and communications	Necessary for our legitimate interests (to analyse how visitors use our website and to develop our services and grow our business).
To administer and protect our business and the website including troubleshooting, data analysis and systems testing	Identity Contact Device	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security). Necessary to comply with a legal obligation.
To deliver relevant content and advertisements to you and measure and understand the effectiveness of the advertising we serve to you.	Identity Contact Device Profile Usage Marketing and communications	
To use data analytics to improve our website, products, services, marketing, customer relationships and experiences	Device Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).
To make suggestions and recommendations to you about products or services	Identity Contact Device	Necessary for our legitimate interests (to develop our products/

that may be of interest to you.	Profile Usage Marketing and communications	services and grow our business).
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### **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.

## **7. Marketing**

We may use your Identity, Contact, Device, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and marketing offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by following the unsubscribe links on any marketing message sent to you, or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase or ongoing customer relationship.

## **8. Disclosures of your personal data**

When you consent to providing us with your personal data, we will also ask you for your consent to share your personal data with the third parties set out below for the purposes set out in the table Purposes for which we will use your personal data:

Third Parties as set out in the Glossary.

Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

## **9. International Transfers**

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data. For further details, see this information from the Information Commissioner's Office.

Where we use certain service providers, we may use specific contracts approved by the UK which give personal data the same protection it has in the UK. For further details, see this information from the Information Commissioner's Office. Please contact us if you want further information on the specific mechanism used by us when transferring your personal

data out of the UK.

## **10. Data Security**

All information you provide to us is stored on our secure servers. We have put in place appropriate procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed, including encrypted storage, access controls to limit who has access to your data, logging and monitoring, and firewalls.

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. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator when we are legally required to do so.

## **11. Data Retention**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

In some circumstances, we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **12. Your legal rights**

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data.

Please scroll down to find out more about these rights:

**Request access to your personal data**

**Request correction of your personal data**

**Request erasure of your personal data**

**Object to processing of your personal data**

**Request restriction of processing your personal data**

**Request transfer of your personal data**

**Right to withdraw consent**

**You also have the right to ask us not to continue to process your personal data for marketing purposes.**

You can exercise any of these rights at any time by contacting us directly.

### **No fee usually required**

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. Alternatively, we could refuse to comply with your request in these circumstances.

### **What we may need from you**

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.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could 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 and keep you updated.

## **13. Glossary**

### **(a) Lawful basis**

**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.

**Consent** means processing your personal data where you have signified your agreement by a statement or clear opt-in to processing for a specific purpose. Consent will only be valid if it is a freely given, specific, informed and unambiguous indication of what you want. You can withdraw your consent at any time by contacting us.

**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 to 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.

### **(b) Third parties**

Service providers acting as processors, including Google, Survey Monkey, x based in the UK and other countries worldwide including the United States, who provide cloud hosting and software services to us.

Professional advisers acting as processors or controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services to us.

HM Revenue and Customs, regulators and other authorities acting as controllers based in the UK who require reporting of processing activities in certain circumstances.

### **(c) Your legal rights**

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. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**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:

- (a) if you want us to establish the data's accuracy
- (b) where our use of the data is unlawful but you do not want us to erase it
- (c) 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
- (d) you have objected to our use of your 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.