



Phronesis Customer Privacy Notice

This privacy notice tells you what to expect us to do with your personal information.

Contact details

Email

stacy.woodman@phronesisconsult.co.uk

What information we collect, use, and why

We collect or use the following information to **provide services and goods, including delivery:**

- Names and contact details
- Purchase or account history
- Payment details (including card or bank information for transfers and direct debits)
- Health and safety information
- Account information
- Website user information (including user journeys and cookie tracking)
- Photographs or video recordings
- Records of meetings and decisions
- Information relating to compliments or complaints

We collect or use the following information for **the operation of customer accounts and guarantees:**

- Names and contact details
- Addresses



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- Payment details (including card or bank information for transfers and direct debits)
- Purchase history
- Account information, including registration details
- Information used for security purposes
- Marketing preferences

We collect or use the following information for **service updates or marketing purposes**:

- Names and contact details
- Marketing preferences
- Location data
- Purchase or viewing history
- IP addresses
- Website and app user journey information
- Records of consent, where appropriate

We collect or use the following information for **research or archiving purposes**:

- Names and contact details
- Addresses
- Website and app user journey information
- Personal information used for administration of research
- Personal information used for the purpose of research
- Records of consent, where appropriate

We collect or use the following information to **comply with legal requirements**:

- Name



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- Contact information
- Identification documents
- Financial transaction information
- Criminal offence data (including Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)
- Health and safety information

Lawful bases

Our lawful bases for collecting or using personal information to **provide services and goods** are:

- Consent
- Contract
- Legal obligation

Our lawful bases for collecting or using personal information for **the operation of customer accounts and guarantees** are:

- Consent
- Contract
- Legal obligation

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

- Consent
- Legitimate interest:
 - To ensure our customers receive relevant information or updates based on the service they have subscribed to or purchased in the event of changes to terms and conditions, pricing, and or general usage.



Our lawful bases for collecting or using personal information for **research or archiving purposes** are:

- Consent
- Contract
- Legal obligation
- Legitimate interest:
 - To allow us to provide research insights into customer challenges, sector and market trends based on our contracted client base.

Our lawful bases for collecting or using personal information for **legal requirements** are:

- Contract
- Legal obligation

Where we get personal information from

- People directly
- Legal and judicial sector organisations
- Publicly available sources

How long we keep information

Personal data is stored in electronic form. Our business will ensure that the personal data we hold is kept secure and is held for no longer than is necessary for the purposes for which it is being processed.

Who we share information with

Data processors

Wix

This data processor manages our website. Their privacy policy can be found [here](#).



Others we share personal information with as required:

- Professional or legal advisors
- Financial or fraud investigation authorities
- Relevant regulatory authorities
- External auditors or inspectors
- Organisations we're legally obliged to share personal information with

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal data.

Your right to rectification - You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal data in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal data in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal data in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.

Your right to withdraw consent - When we use consent as our lawful basis you have the right to withdraw your consent.



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You don't usually need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

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