

PRIVACY POLICY

Introduction

Fox Red Consultants Limited respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data, and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below.

1. IMPORTANT INFORMATION AND WHO WE ARE (paragraph 1)
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1. Important information and who we are

This privacy policy gives you information about how Fox Red collects and uses personal data belonging to you or your personnel in the context of providing consultancy services to you or your business, through your use of the firm's website and through any of the other ways we interact, as set out in more detail in paragraph 3 below.

The firm's website is not intended for children and we do not knowingly collect data relating to children.

Controller

Fox Red is the controller and responsible for your personal data (collectively referred to as Fox Red, we, us or our in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights (Paragraph 9), contact us using the information set out in the contact details section (Paragraph 10).

2. The personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

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, last name, any previous names, or similar identifier, name of inventor, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **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, device ID and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you interact with and use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of our engagement with you and you fail to provide that data when requested, we may not be able to perform the services set out in the engagement letter.

3. How is your personal data collected?

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

- In the process of carrying out work for you (or your business) where we will in almost all instances act as a controller. In very limited circumstances we may act as a processor in which case we will let you know and ensure that an appropriate contract is put in place.
- When we communicate with you by email or other electronic correspondence, by telephone or using video conferencing software. You may give us your and any relevant third party's Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - make a request for our services;
 - create an account on our website;
 - request marketing to be sent to you;
 - complete a survey; or
 - provide us with feedback.
- Networking (for example, at in-person or virtual events).
- Otherwise through providing our services and operating our business.

We also collect data from and about you via our website:

- through your actions;
- through 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.
- Technical Data is collected from analytics providers such as Google based outside the UK; and
- Contact, Financial and Transaction Data from providers of payment services.

We will also collect Identity and Contact Data from publicly available sources such as the Intellectual Property Office, Companies House and the Electoral Register based inside the UK.

4. How we use your personal data

Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.

- **Legitimate interests:** Where it is necessary for our legitimate interests as a consultancy services provider (or those of a third party) and your interests and fundamental rights do not override those interests.
- **Legal obligation:** Where we need to comply with a legal obligation to which we are subject.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

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.

Purpose/Use	Type of data	Lawful basis
To check whether we can act for you as a new or existing client.	Identity Contact Financial Professional	Performance of a contract with you Necessary to comply with a legal or regulatory obligation Public interest Necessary for our legitimate interests (to detect and prevent the commission of fraud, money laundering and terrorism offences)
To deliver our services to you including engaging service providers, managing payments, fees and charges and collecting and recovering money owed to us	Identity Contact Financial Transaction Marketing and Communications	Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include notifying you about changes to our terms or privacy policy	Identity Contact Profile Marketing and Communications	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how customers and clients use our products and services)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Contact Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) Necessary to comply with a legal obligation
To deliver relevant website content to you and measure or understand the effectiveness of the marketing we provide to you	Identity Contact Profile Usage Marketing and Communications Technical	Necessary for our legitimate interests (to study how customers use our products and services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products and services,	Technical Usage	Necessary for our legitimate interests (to define types of clients and customers for our products and services, to keep our

Purpose/Use	Type of data	Lawful basis
marketing, customer relationships and experiences		website updated and relevant, to develop our business and to inform our marketing strategy)

Direct marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, 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 products, services and offers may be relevant for you (we call this marketing).

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

Third-party marketing

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

Opting out of marketing

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes for example checking that your contact details are correct.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, some parts of this website may become inaccessible or not function properly.

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table above:

- Any professional advisors assisting with provision of our services, or to whom we refer you so that they can provide services to you direct, for example patent attorneys, trade mark agents and lawyers.
- Our service providers acting as processors who may be based in the United Kingdom or overseas who provide IT development, platform and website services, software services, and marketing and system administration services to us.

- Our professional advisers acting as processors or joint controllers including lawyers, marketing consultants, bankers, auditors and insurers based who provide consultancy, marketing, banking, legal, insurance and accounting services to us.
- HM Revenue & Customs, regulators such as IPReg, and other governmental authorities such as the National Crime Agency or Serious Fraud Office acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- 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.

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.

6. International transfers

We do not transfer your personal data outside the UK.

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

8. Data retention

How long will you use my personal data for?

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 paragraph 9 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.

9. Your legal rights

You have rights under data protection laws in relation to your personal data to:

- **Request access to your personal data** (commonly known as a "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** in certain circumstances. 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) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see Opting out of marketing in paragraph 4 for details of how to object to receiving direct marketing communications).
- **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 (see the table in section 4 for details of when we rely on your consent as the legal basis for using your 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.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in one of 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; or
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us.

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.

10. Contact details

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact us in the following ways:

Email address: mail@foxredconsultants.com

Postal address: 28 Cedar Glade, York, YO19 5QZ

Telephone number: 01904 373121

11. Complaints

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

12. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

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 your relationship with us, for example a new address or email address.

13. 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 policy of every website you visit.