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DOCUMENT TITLE: PRIVACY POLICY Version: 1.0

#### 1. Our contact details.

Name: Nigel Perry

Address: 3 Haroldslea Drive. Horley, Surrey RH6 9DT, United Kingdom

Phone Number: +44 (0) 7500 765721

E-mail: nigel.perry@pyrige.co.uk

Effective date of the privacy policy: 06th March 2023

#### 2. Your personal data – what is it?

Personal data relates to a living individual (data subject) who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in Pyrige Limited possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR").

## 3. The type of personal information we may collect.

We may collect and process the following information:

- Personal identifiers, contacts, and characteristics (for example, name and contact details, organisational role)
- Customer financial information (for example account details for payment purposes)

You can find more about <u>what constitutes personal information</u> on the Information Commissioners Office [ICS] website.

#### 4. How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- To enable Pyrige Limited to provide services to your business to fulfil a contract(s) made between your company and Pyrige Limited
- To maintain our own accounts and records

[If applicable] We may also receive personal information indirectly in the following scenarios:

- Scenario 1, Pyrige Limited is contracted to undertake business analysis. In order to do this, we require process information either directly or indirectly from your client or your client's 3<sup>rd</sup> partners and suppliers. The information may be provided either partially or in its entirety via secure file transfer [such as WeTransfer] or encrypted [password protected] documents.
- Scenario 2, Pyrige Limited is contracted to perform a deep dive on an organisation focusing on the
  quality of services provided. In order to do this we may interview or survey customers of the service to
  obtain constructive feedback for the purposes of improving the service being provided.

We use the information that you have given us in order to.

• Enable Pyrige Limited to provide services to your business to fulfil a contract(s) made between your company and Pyrige Limited

We may share this information [subject to lawful basis] with other consultants engaged for the purposes of delivering agreed work for the same client.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- a) Your consent. You can remove your consent at any time. You can do this by contacting **Nigel Perry** [details are provided on the first page of this document]
- b) We have a contractual obligation.
- c) We have a legal obligation.
- d) We have a vital interest.
- e) We need it to perform a public task.
- f) We have a legitimate interest.

#### 5. How we keep and dispose of your information

Your information is securely stored on cloud storage provided by Microsoft and Apple.

We keep information for the period of time necessary to complete the contracted work.

As per lawful basis, we may retain information to the event of repeat work or information requests. This period of time is typically no more than 2 years from contract completion.

We will then securely dispose your information by deletion from the cloud storage and also deletion of any email that contains applicable information.

### 6. 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 information.

**Your right to rectification** - You have the right to ask us to rectify personal information 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 information in certain circumstances.

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

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

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

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at <u>nigel.perry@pyrige.co.uk</u> if you wish to make a request.

The <u>lawful basis</u> page of the ICS Guide to the GDPR has a useful table that shows the varying rights that apply depending on the lawful basis.

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### 7. How to complain.

If you have any concerns about our use of your personal information, you can make a complaint to us nigel.perry@pyrige.co.uk

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

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

Helpline number: 0303 123 1113

ICO website: <a href="https://www.ico.org.uk">https://www.ico.org.uk</a>

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The ICO's address:

Information Commissioner's Office

# 8. Revision history.

Date	Initials	Change
6 <sup>th</sup> March 2023	NSP	New Policy