

BIRRING & BAGRI LTD

PRIVACY NOTICE

Effective: September 2026 | Last reviewed: September 2026 | Next review: September 2027

1. About this Privacy Notice

Birring & Bagri Ltd ("Birring & Bagri", "we", "us" or "our") is committed to respecting and protecting the privacy of individuals whose personal information we process.

This Privacy Notice explains how we collect, use, store, share and protect personal information in connection with our website, professional services, business relationships, events, initiatives and other business activities. It also explains the rights individuals have in relation to their personal information.

This Notice applies to visitors to our website, prospective and existing clients, client representatives, professional and business contacts, suppliers, contractors, associates, event and initiative participants, and other individuals who interact with Birring & Bagri in a professional or business capacity.

2. Who We Are

Birring & Bagri Ltd is a UK-based professional consultancy providing advisory and consultancy services, including in areas such as strategy, procurement and commercial advisory, governance, public policy, international trade and related professional services.

For the purposes of applicable UK data protection legislation, Birring & Bagri Ltd will generally act as the **controller** of personal information covered by this Privacy Notice.

Website: www.birringandbagri.com

Privacy enquiries: info@birringandbagri.com

Where we process personal information solely on the documented instructions of a client, we may instead act as a **processor** and the relevant client's privacy arrangements may also apply.

3. Personal Information We May Collect

Depending on how an individual interacts with us, we may collect and process information including:

- name, title and professional role;
- employer or organisation;
- business address;
- telephone number and email address;
- professional and business contact information;
- correspondence and communications with us;
- information provided through website enquiries or contact forms;
- information relating to prospective or existing client engagements;
- contractual, invoicing and transaction information;
- records of meetings, discussions and professional interactions;
- event, conference or initiative registration and participation information;
- professional interests and areas of expertise;

- publicly available professional information;
- information obtained through professional networks, introductions, referrals and publicly available sources;
- technical information relating to use of our website, where collected, such as IP address, browser information, device information and cookie or analytics information; and
- other personal information voluntarily provided to us or reasonably required in connection with our professional activities.

We seek to collect only personal information that is relevant and proportionate to the purpose for which it is required.

4. Special Category and Sensitive Information

Birring & Bagri does not ordinarily seek to collect special category personal information through its website.

However, certain professional engagements or interactions may exceptionally involve information that is more sensitive in nature. Where this occurs, we will only process such information where there is an appropriate legal basis and, where required, an additional condition permitting its processing.

We ask individuals not to provide sensitive personal information through general website enquiry channels unless it is genuinely necessary.

5. How We Obtain Personal Information

We may obtain personal information:

- directly from an individual;
- through our website;
- during discussions concerning prospective or existing engagements;
- through contracts and professional relationships;
- from clients, suppliers, professional advisers, associates or business partners;
- through referrals and professional introductions;
- through conferences, meetings, networking activities and other professional events;
- from organisations with which an individual is professionally associated; and
- from legitimate publicly available sources, including corporate websites, professional directories, Companies House and professional networking platforms.

Where we obtain personal information from a source other than the individual concerned, we will handle that information in accordance with applicable data protection requirements.

6. How We Use Personal Information

We may process personal information for purposes including:

- responding to enquiries and requests;
- assessing prospective engagements;
- providing consultancy and advisory services;
- managing client and professional relationships;
- communicating with clients, prospective clients, suppliers, associates and other professional contacts;
- administering contracts and engagements;
- conducting appropriate client, supplier or counterparty due diligence;

- managing invoices, payments and financial administration;
- organising and administering meetings, events, conferences and initiatives;
- developing and maintaining professional and business relationships;
- improving our services and business operations;
- maintaining appropriate business and professional records;
- protecting our legal and commercial interests;
- establishing, exercising or defending legal rights;
- complying with legal, regulatory, tax, accounting and other obligations;
- preventing or identifying fraud, misuse, security incidents or other unlawful activity;
- maintaining the security and integrity of our systems and website;
- communicating relevant information about our services, activities, events, publications or initiatives where permitted by law; and
- managing and developing Birring & Bagri's business.

We will not use personal information for purposes that are incompatible with the purpose for which it was originally collected unless permitted by law.

7. Our Lawful Bases for Processing

Under UK data protection law, we must have a lawful basis for processing personal information. Depending on the circumstances, we may rely on one or more of the following:

Contract

Where processing is necessary to enter into or perform a contract with an individual.

Legal obligation

Where processing is necessary for us to comply with a legal or regulatory obligation.

Legitimate interests

Where processing is necessary for our legitimate business interests or those of another party and those interests are not overridden by the individual's rights and interests. Our legitimate interests may include operating and developing our consultancy business; responding to and managing business enquiries; delivering and improving professional services; maintaining client and professional relationships; conducting proportionate business development; maintaining appropriate corporate records; protecting our business, systems and information; preventing fraud and misuse; and establishing, exercising and defending legal rights. Where required, we consider the nature and impact of the processing and the individual's reasonable expectations before relying upon legitimate interests.

Consent

Where consent is the appropriate lawful basis, we will seek it before processing. Where processing relies on consent, an individual may withdraw that consent at any time. Withdrawal of consent does not affect the lawfulness of processing undertaken before consent was withdrawn.

8. Business Development and Professional Communications

We may use professional contact information to communicate with existing or prospective clients and other professional contacts about Birring & Bagri's services, publications, events, initiatives or other matters that we reasonably consider relevant to the professional relationship.

We will undertake such communications in accordance with applicable data protection and electronic marketing requirements. Individuals have the right to object to the use of their personal information for direct

marketing at any time. Where consent is legally required for a particular communication, we will obtain the necessary consent.

9. Artificial Intelligence and Technology

Birring & Bagri may use appropriate digital technologies, including artificial intelligence-enabled tools, to support aspects of its business and professional activities.

Where personal information is processed using such technologies, we will seek to ensure that its use is lawful, proportionate and subject to appropriate safeguards.

We do not intend to make decisions producing legal or similarly significant effects on individuals solely through automated processing unless this is lawful, appropriate and the individual has been provided with the information and safeguards required by applicable law.

Further information about our approach to artificial intelligence is set out in our **Responsible AI Statement**.

10. Sharing Personal Information

We do not sell personal information.

Where necessary and lawful, we may share personal information with appropriate third parties, including:

- professional advisers;
- accountants and auditors;
- legal advisers;
- IT, cloud, communications and technology service providers;
- website hosting and support providers;
- payment and financial service providers;
- contractors, consultants and associates supporting our work;
- event or initiative partners where appropriate;
- clients where necessary for the relevant engagement;
- regulatory, governmental, law-enforcement or public authorities where required or permitted by law; and
- other parties where disclosure is necessary to establish, exercise or defend legal rights or protect legitimate business interests.

Third-party access will be limited to what is reasonably necessary for the relevant purpose. Where a third party processes personal information on our behalf, we will seek to put appropriate contractual and organisational safeguards in place where required.

11. International Transfers

Our business, clients, professional relationships and technology providers may operate internationally. As a result, personal information may in some circumstances be processed or accessed outside the United Kingdom.

Where personal information is transferred internationally, we will take appropriate steps to ensure that the transfer complies with applicable UK data protection requirements. Depending on the destination and circumstances, these measures may include applicable adequacy arrangements, recognised contractual safeguards or another lawful transfer mechanism.

12. Information Security

Birring & Bagri takes reasonable and proportionate technical and organisational measures designed to protect personal information against unauthorised access, loss, misuse, alteration or disclosure. Access to personal

information is restricted according to legitimate business requirements.

No internet-based system can, however, be guaranteed to be completely secure. Individuals should therefore exercise appropriate care when transmitting information electronically.

13. How Long We Keep Personal Information

We retain personal information only for as long as reasonably necessary for the purposes for which it was collected and to meet applicable legal, regulatory, contractual, tax, accounting, professional and legitimate business requirements.

Retention periods vary according to the nature of the information and the purpose for which it is held. When personal information is no longer required, we will take reasonable steps to securely delete, anonymise or otherwise dispose of it, subject to applicable legal and operational requirements.

14. Individual Rights

Subject to applicable law and any relevant exemptions, individuals may have rights including:

- the right to be informed about how their personal information is used;
- the right to request access to personal information held about them;
- the right to request correction of inaccurate or incomplete information;
- the right to request deletion of personal information in certain circumstances;
- the right to request restriction of processing in certain circumstances;
- the right to object to certain processing, including direct marketing;
- the right to data portability in applicable circumstances;
- rights relating to certain forms of automated decision-making and profiling; and
- the right to withdraw consent where processing is based upon consent.

These rights are not absolute and their application depends upon the circumstances and applicable law.

Requests concerning personal information or data protection rights can be submitted to **info@birringandbagri.com**. We may need to take reasonable steps to verify identity before responding to a request.

15. Cookies and Website Technologies

Our website may use cookies and similar technologies for purposes such as website functionality, security, user preferences and analytics. Where consent is legally required for a particular cookie or technology, it will not be used until the necessary consent has been obtained.

Further information is provided in our **Cookie Policy**.

16. Third-Party Websites

Our website may contain links to websites or services operated by third parties. Birring & Bagri is not responsible for the privacy practices of independent third-party websites. Individuals should review the privacy information provided by the relevant third party before providing personal information to them.

17. Children's Information

Birring & Bagri's website and professional services are primarily directed towards organisations, professionals and other business users and are not intended for children.

We do not knowingly seek to collect children's personal information through our general website services. If we become aware that children's personal information has been collected in circumstances where it should not

have been, we will take appropriate steps in accordance with applicable law.

18. Complaints

If an individual has concerns about how Birring & Bagri has handled their personal information, we encourage them to contact us first so that we have an opportunity to investigate and address the matter.

Email: info@birringandbagri.com

Individuals also have the right to make a complaint to the UK's data protection supervisory authority, the **Information Commissioner's Office (ICO)**.

19. Changes to this Privacy Notice

We may update this Privacy Notice periodically to reflect changes in our business activities, technology, legal requirements or data protection practices.

The current version will be published on our website and will state the date on which it was last reviewed.

Where a change materially affects how we use personal information, we will take appropriate steps to bring the change to the attention of affected individuals where required.

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