

Website Privacy Notice

Actually Data Limited

Last updated: 27 July 2026

1. Introduction

This privacy notice provides you with details of how Actually Data Limited ("we", "us", "our") collects and processes your personal data through your use of our website actuallydata.co.uk, and through our dealings with you as a client, supplier, or other business contact.

By providing us with your data, you warrant to us that you are over 13 years of age. Our website is not directed at children and we do not knowingly collect data from children.

Actually Data Limited is the data controller and is responsible for your personal data. We have not appointed a formal Data Protection Officer, as this is not a legal requirement for a business of our size and activities. Any questions about this privacy notice should be directed to our nominated privacy contact, Anthony Fawkes, using the details below.

Contact Details

Our full details are:

- Full name of legal entity: Actually Data Limited
- Company registration number: 9604275 (registered in England and Wales)
- Nominated privacy contact: Anthony Fawkes, Director
- Email address: anthony@actuallydata.com
- Postal address: 3 Milestone Road, Crystal Palace, London SE19 2LL

As we are established in the UK and do not routinely process data from individuals based in the EU, we have not appointed a UK or EU representative. We keep this position under review, and if our client base or website audience expands to include a meaningful number of EU-based individuals, we will assess whether an EU representative is required under Article 27 UK GDPR.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at anthony@actuallydata.com.

2. What Data We Collect About You, For What Purpose, And On What Ground We Process It

Personal data means any information capable of identifying an individual. It does not include anonymised data. We may process the following categories of personal data about you:

Communication Data

This includes any communication that you send to us, whether through the contact form on our website, by email, phone, or social media messaging. We process this data to reply to your enquiry, to keep records, and to establish, pursue or defend legal claims. Our lawful ground for this processing is our legitimate interests, namely to respond to enquiries and manage our correspondence.

Client and Enquirer Data

This includes your name, job title, organisation, billing and contact details, and details of the services you have enquired about or purchased from us. We process this data to deliver our services, administer contracts, and handle billing. Our lawful ground for this processing is the performance of a contract with you (or your organisation) and/or taking steps at your request before entering into a contract.

User and Technical Data

This includes data about how you use our website, together with your IP address, browser type, device information, and navigation paths, collected via our analytics tools. We process this data to operate and secure our website, to understand how it is used, and to improve our content. Our lawful ground for this processing is our legitimate interests, namely to properly administer our website and business.

Marketing Data

This includes your preferences in receiving marketing from us and your communication preferences. Our lawful ground for this processing is your consent, or in limited circumstances our legitimate interests (see Section 4, Marketing Communications, below).

Client Project Data (Processed on Behalf of Clients)

Where we are engaged by a client to support CRM implementation, data migration, transformation, or analytics work, we may process personal data belonging to that client's own contacts, donors, or service users (for example, records held in Raiser's Edge NXT, BeaconCRM, Access Charity CRM, thankQ, Oomi, or Engaging Networks). In this context, we act as a data processor on our client's instructions, not as the controller. That processing is governed by our contract and data processing terms with the relevant client, and it is the client's responsibility, as controller, to inform their own data subjects. This notice does not cover that processing.

Sensitive Data, Criminal Conviction Data, and Automated Decision-Making

We do not collect any special category (sensitive) data about you, such as details of race or ethnicity, religious beliefs, health, or sexual orientation. We do not collect any information about criminal convictions or offences. We do not carry out automated decision-making or profiling that produces legal or similarly significant effects on you.

Required Processing

Where we need to collect personal data by law, or under the terms of a contract with you, and you do not provide that data when requested, we may not be able to perform the contract, for example to deliver our services. If this happens, we will notify you at the time.

3. How We Collect Your Personal Data

We collect data about you directly, when you fill in a form on our website, email us, or speak with us. We may also automatically collect certain data as you use our website, using cookies and similar technologies. We may occasionally receive data from publicly available sources such as Companies House, or from analytics providers such as Google, in each case based in the UK or EEA.

4. Marketing Communications

Our lawful ground for sending you marketing communications is either your consent, or our legitimate interests in growing our business, in each case in compliance with the Privacy and Electronic Communications Regulations (PECR).

Under PECR, we may send you marketing communications if you made an enquiry or purchase from us, or if you agreed to receive marketing, and in each case you have not since opted out.

You can stop receiving marketing messages from us at any time by using the unsubscribe link included in any marketing email, or by emailing us at anthony@actuallydata.com. Opting out of marketing does not affect our ability to send you service-related communications, for example about a contract you have with us.

We will not share your personal data with any third party for their own marketing purposes without your express consent.

5. Disclosures Of Your Personal Data

We may share your personal data with:

- Other companies within the Actually Data group (Actually Data Ltd, Actually Data Analytics Ltd) where relevant to providing our services or running our business.
- Service providers who support our IT, systems administration, and business operations, including Microsoft 365, Google Drive, Notion, Metricool, Zoho/Bigin CRM, and QuickBooks Online.
- Professional advisers, including our accountants, solicitors, bankers, and insurers.
- Government bodies, such as HMRC, where we are required to report processing activities.
- Third parties to whom we sell, transfer, or merge parts of our business or assets, should this ever occur.

We require all third parties to respect the security of your data and to treat it in accordance with the law. We only allow them to process your personal data for specified purposes and in line with our instructions.

6. International Transfers

The core service providers we use for our own business operations, Microsoft 365, QuickBooks Online, Notion, Metricool, Zoho/Bigin, and Google Drive, are configured to store and process data in UK or EU/EEA data centres. As a result, we do not routinely transfer your personal data outside the UK or the EEA.

Where a transfer outside the UK or EEA does occur, for example if a service provider's infrastructure changes, we will ensure appropriate safeguards are in place, such as an adequacy decision, the UK-US Data Bridge or EU-US Data Privacy Framework, or the International Data Transfer Agreement or UK Addendum to the EU Standard Contractual Clauses.

This section does not cover client project data we process as a processor under Section 2 above. Any international transfer requirements for that data are addressed separately in our contract and data processing agreement with the relevant client.

7. Data Security

We have put in place technical and organisational measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. Access to

personal data is limited to those who have a genuine business need, and they are subject to a duty of confidentiality.

We have procedures in place to deal with any suspected personal data breach and will notify you and the ICO where we are legally required to do so.

8. Data Retention

We only keep personal data for as long as necessary for the purpose it was collected for. Our standard retention periods are:

- Client and enquirer contact data (names, emails, phone numbers, billing details): retained for 7 years from the last transaction or contract, in line with HMRC requirements and the Limitation Act 1980. Dormant contacts with no contractual or billing history are reviewed and removed annually.
- Client project data processed as part of a migration, transformation, or analytics engagement: retained for the duration of the live project and for 12 months afterwards to allow for client queries, then securely deleted or returned to the client.
- Marketing consent and opt-out records: consent records retained for 3 years after your last interaction with us; opt-out (suppression) records retained indefinitely, to ensure we do not contact you again by mistake.

A full breakdown of retention periods by data category is set out in our internal Data Protection Policy, available on request.

9. Your Legal Rights

Under data protection law, you have rights in relation to your personal data, including the right to request access, correction, erasure, or restriction of processing, to object to processing, to data portability, and, where consent is the legal basis, to withdraw that consent.

You can read more about these rights at ico.org.uk. If you are based in the EU, you can also contact the data protection authority in your own country.

If you wish to exercise any of these rights, please email us at anthony@actuallydata.com. You will not usually have to pay a fee, unless your request is clearly unfounded, repetitive, or excessive. We may need to verify your identity before responding, and we aim to respond within one month, extendable by a further two months for complex requests, in which case we will let you know within the first month.

10. How To Complain

If you have a complaint about how we handle your personal data, please contact us first so we can try to resolve it. You can reach us by emailing helen@actuallydata.com or writing to us at 3 Milestone Road, Crystal Palace, London SE19 2LL. We will acknowledge your complaint within 30 days of receiving it, investigate without undue delay, keep you informed of our progress, and explain the outcome clearly.

If you are in the UK and are not satisfied with our response, you have the right to complain to the Information Commissioner's Office (ICO) at www.ico.org.uk. If you are based in the EU, you have the right to complain to the data protection authority in the country where you are based.

11. Third-Party Links

Our website may include links to third-party websites, plug-ins, and applications. Clicking those links may allow third parties to collect or share data about you. We do not control these third-party sites and are not responsible for their privacy practices. We encourage you to read the privacy notice of every website you visit.

12. Cookies

You can set your browser to refuse cookies, or to alert you when a website sets or accesses cookies. If you disable cookies, some parts of our website may not function properly. Our cookie policy can be [reviewed here](#).