

Denning Advisory Limited

Privacy Notice

This privacy notice explains how Denning Advisory Limited (referred to in this policy as “**we**”, “**us**” or “**our**”) uses and protects your personal data.

1. Who we are

We are Denning Advisory Limited, a company incorporated and registered in England and Wales with company number 16647816. We are the controller and are responsible for your personal data. We are registered as Tier 1 Data Controller with the Information Commissioners Office under reference number ZB985601.

2. Contact details

Post: Preston Park House, South Road, Brighton, East Sussex, BN1 6SB, GB

Email: info@denningadvisory.com

3. What information we collect

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

We may collect personal data from, or relating to, the following categories of individuals:

- Individuals who work for, or with, our clients;
- Individuals who work for our suppliers;
- Visitors to our website; and
- Other individuals who may contact us from time to time.

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 and title;
- **Contact Data** includes work address, home address, email address(es) and telephone numbers;
- **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; and
- **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.

4. How is your personal data collected?

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

- **Your interactions with us.** You may give us your personal data by filling in the online form on our website or by corresponding with us by post, phone, email or otherwise.
- **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, server logs and other similar technologies. Please see our cookie policy for further details.
- **Third parties or publicly available sources.** We may obtain or receive personal data about you from various third parties and public sources as set out below.
 - Technical Data is collected from website hosting providers such as GoDaddy based outside the UK;
 - Identity and Contact Data is collected from data brokers or aggregators such as Rocket Reach, Pitchbook and LinkedIn based outside the UK.
 - Identity and Contact Data is collected from publicly available sources such as Companies House based inside the UK.
 - Identity and Contact Data is collected from public sources such as individual company websites based inside and outside the UK.

5. Our lawful bases for the collection and use of your data

Under UK and EU data protection laws, we must have a “lawful basis” for collecting and using your personal data. We use the following lawful bases for collecting and using your personal data:

- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you.
- **Legal obligation** – We may have to collect or use your personal data so we can comply with the law.
- **Legitimate interests** – We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **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 or otherwise consent to receive marketing communications from us.

6. How we use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of 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	Legal basis
To conclude and manage contracts with our clients and suppliers: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Marketing and Communications	Necessary for our legitimate interests (to enter into and manage contracts with our clients and suppliers and to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Dealing with your requests, complaints and queries	(a) Identity (b) Contact (c) Marketing and Communications	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)
To arrange corporate events	(a) Identity (b) Contact (c) Marketing and Communications	Necessary for our legitimate interests (to promote and grow our business and to serve our clients)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) 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) (b) Necessary to comply with a legal obligation
To send you relevant marketing communications	(a) Identity (b) Contact (c) Technical (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business) or Consent, having obtained your prior consent to receiving direct marketing communications
To carry out market research through your voluntary participation in surveys		Necessary for our legitimate interests (to study how customers use our products/services and to help us improve and develop our products and services).

7. Marketing

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

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

You can ask to stop sending you marketing communications at any time by [contacting us](#). If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes.

8. 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.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. How long we keep your personal data

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.

By law we have to keep basic information about our customers (including Contact and Identity Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see section 12 below for further information.

For more information on how long we store your personal data or the criteria we use to determine this please [contact us](#) using the details provided above.

10. Who we share information with

We may share your personal data where necessary with the parties set out below for the purposes set out in the table at section 6 above:

- Third party service providers such as providers of IT support and maintenance and cloud storage;
- Our insurance provider (for example, in the event of a claim);

- Our professional advisors such as our accountants and legal advisors;
- Your other professional advisors or intermediaries, where you ask us to liaise with them as part of the work we agree to do for our client;
- Organisations we're legally obliged to share personal data with such as HMRC and other regulatory authorities; and
- 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.

11. International transfers

We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside the UK to countries which have laws that do not provide the same level of data protection as the UK law.

Whenever we transfer your personal data out of the UK to service providers, we ensure a similar degree of protection is afforded to it by ensuring that one of the following safeguards are in place:

- We will only transfer your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data. For further details please see [here](#);
- We may use specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK, namely the International Data Transfer Agreement or the International Data Transfer Addendum to the European Commission's standard contractual clauses for international data transfers; or
- Where we intend to transfer personal data to the United States, the recipient is certified under the UK Extension to the EU-US Data Privacy Framework (also known as the UK-US data bridge).

For further details, please [contact us](#).

12. Your legal rights

- **Your right of access** - You have the right to ask us for copies of your personal data. You can request other information such as details about where we get personal data from and who we share personal data with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access](#).
- **Your right to rectification** - You have the right to ask us to correct or delete personal data you think is inaccurate or incomplete. [Read more about the right to rectification](#).
- **Your right to erasure** - You have the right to ask us to delete or remove your 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. [Read more about the right to erasure](#).

- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal data, including asking us not to delete it. [Read more about the right to restriction of processing](#).
- **Your right to object to processing** - You have the right to object to the 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. [Read more about the right to object to processing](#).
- **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. 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. [Read more about the right to data portability](#).
- **Your right to withdraw consent** – When we use consent as our lawful basis for processing your personal data you have the right to withdraw your consent at any time. 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 services to you. We will advise you if this is the case at the time you withdraw your consent. [Read more about the right to withdraw consent](#).
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes.

If you wish to exercise any of the rights set out above, please [contact us](#) using the details provided above.

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.

13. 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](#) provided in 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 Information Commissioner's Office ("ICO"), the UK regulator for data protection issues.

The ICO's contact details are as follows:

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>

14. Changes to this privacy notice

We keep our privacy policy under regular review. This version was last updated on 11 September 2025.

15. 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.