

## Data Handling & Privacy Policy

### Overview

This notice tells you about any personal information that we might collect, how we handle it, and why. This document and policy only covers data that we collect as an integral part of operating as a business, and not as a result of providing services to customers.

It is possible that our customers may use our services for their own storage and processing of personal data, and sensitive personal data that they control. Such data and its processing are not covered by this document, but is dealt with separately between us and our customers.

### Types of Information we collect

The types of data that we process, and the reasons for our possession of them, are as follows:

Contact details of individuals	<ul style="list-style-type: none"> <li>• For customers, suppliers, and others with whom we transact business or are seeking to do so</li> <li>• About individuals within organisations in the markets where we operate, who are likely to be interested in research, opinions, ideas and guidance from influential people</li> <li>• About employees</li> </ul>
Sensitive personal details	<ul style="list-style-type: none"> <li>• About employees and certain suppliers, only as required for us to operate as a business</li> </ul>
Other regulated data	<ul style="list-style-type: none"> <li>• Only as may be sent to, stored in, processed on, and extracted from the IT services we provide, by the customers to whom we provide these services.</li> </ul>

### Reasons/purposes for processing information

We process personal information to enable us to provide IT services to our customers; maintain our accounts and records; promote and advertise our services; support and manage our employees; circulate research, opinions, ideas and guidance from influential people likely to be of interest to those in the markets in which we operate.

### Type/classes of information processed

We process information relating to the above reasons/purposes. In certain very specific cases only, this information may include:

- personal details and next of kin
- goods and services
- financial details
- education and employment details

## Who the information is processed about

We process personal information about:

- customers
- suppliers
- professional experts and consultants
- enquirers
- employees

## Who the information may be shared with

We sometimes need to share the personal information we process with the individual themselves and also with other organisations. Where this is necessary we are required to comply with all aspects of the Data Protection Act (DPA). What follows is a description of the types of organisations we may need to share some of the personal information we process with for one or more reasons.

Where necessary or required we share information with:

- business associates and professional advisers
- family, associates and representatives of the person whose personal data we are processing
- current, past or prospective employers
- educators and examining bodies
- financial organisations
- employment and recruitment agencies
- central government and regulatory agencies
- credit reference agencies
- debt collection agencies
- suppliers

## Undertaking research

Personal information is also processed in order to undertake research. For this reason the information processed may include name, contact details, goods and services. Where required of us, this information may be shared with regulatory organisations.

## Handling of Personal Data

Access to such personal data as we hold is strictly limited, and only those who need to access data have that access, and they only have access for as long as is required for the legitimate use of it.

We have specific processes in place to ensure that copies of personal data are not created unduly or without good reason, and are destroyed as soon as the task for which they have been made is completed.

We do not transfer data outside the European Economic Area (EEA)

## Main contact details

Mr Peter Osborn, Chairman, [peter.osborn@flexiion.com](mailto:peter.osborn@flexiion.com), 0302 642 5109, Flexiion Ltd.,  
Registered office address: 152 Bristol Road, Gloucester, England, GL1 5SR