Phyonis Limited Privacy Notice

PPN-01 v4-00

Background

This document contains Phyonis Limited's Privacy Notice.

The text of this Privacy Notice given below is also contained on Phyonis Limited's website here: https://www.phyonis.com/privacy-notice

Introduction

Phyonis Limited is collectively referred to as: "Phyonis Limited" ,"Phyonis", "we", "us" and / or "our" in this privacy notice.

Phyonis Limited respects your privacy and is committed to protecting your personal data. This privacy notice informs you about how your personal data is used and protected when you contact us and / or visit our website and when we provide our services to you. It also tells you about your privacy rights and how the law protects you.

Please note that whilst access to Phyonis Limited's website is secure and protected via encryption (known as a Secure Sockets Layer (SSL) certificate) which can be verified by clicking on the padlock icon in the URL, the transmission of information over the internet (including via email) is generally not absolutely secure. Any data an individual transmits to Phyonis Limited is sent at their own risk, however, Phyonis Limited does have procedures and security features in place to protect that data once we have received it.

Please also use the Glossary section in this document to understand the meaning of some of the terms used in this privacy notice.

Important information and who we are

Purpose of this privacy notice

This privacy notice gives you information on how Phyonis Limited collects and processes your personal data through all your engagements with us, when using our services and using our website, including any data you may provide when you sign up to our services, our newsletters (if any) or request information about other services from Phyonis Limited.

The Phyonis Limited website (https://www.phyonis.com) is not intended for children under the age of thirteen (13) years old and we do not knowingly collect data relating to them via the Phyonis Limited website. If we learn we have collected or received personal information from a child under the age of thirteen (13) years old via the Phyonis Limited website, we will delete that information. If you believe that we might have collected or received any personal information from or about a child under the age of thirteen (13) years old via the Phyonis Limited website, please contact us at: info@phyonis.com.

This privacy notice must be read alongside the following documents which are available on the Phyonis Limited website:

a) the Phyonis Limited Terms and Conditions (see https://www.phyonis.com/terms-and-conditions)

b) the Phyonis Limited Cookie Notice (see https://www.phyonis.com/cookie-notice)

© Phyonis Limited

c) the Phyonis Limited Disclaimer (see https://www.phyonis.com/disclaimer).

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Data Controller

Phyonis Limited is the data controller and is responsible for your personal data.

The Director of Phyonis Limited is responsible for overseeing questions in relation to this privacy notice.

If you have any questions about this privacy notice, including any requests to exercise your legal rights (including any opt-out mentioned in this privacy notice), please contact the Director of Phyonis Limited using the details set out in the "Contact details" section of this document, below.

Contact details

In the event that you need to contact us, please use the following contact details:

The Director

Phyonis Limited

Email address: info@phyonis.com

Postal address: Chancery House, 30 St Johns Road, Woking, Surrey, GU21 7SA.

Telephone number: +44 (0)7470 966 565

You have the right to make a complaint at any time to the competent supervisory authority for data protection issues. In the UK, this is the Information Commissioner's Office (ICO). Contact details can be found at www.ico.org.

At Phyonis Limited we would, however, appreciate the chance to understand and address your concerns before you approach the competent supervisory authority, so please contact the Director of Phyonis Limited in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This formal version (v4-00) of our privacy notice was issued on 24th April 2024.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

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 notice of every website you visit.

The data we collect about you

© Phyonis Limited

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (i.e. aggregated or anonymous data).

For clients and users of our products and services, 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, username or similar identifier, title, date of birth and gender.
- **Contact Data** includes: billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes: bank account details.
- **Transaction Data** includes: details about payments to and from you and other details of services you have purchased from us.
- **Technical Data** includes: internet protocol (IP) address, your login data, browser type, language and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website and our services.
- **Profile Data** includes: your Phyonis Limited website username and password, services purchased by you, your interests, preferences and feedback.
- **Usage Data** includes: information about how you use our website and services.
- **Marketing and Communications Data** includes: your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

How we collect your personal data

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

- Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms, agreements or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
    - Apply for our services.
    - Enter into an agreement with us.
    - Subscribe to our service or publications.
    - Give us some feedback.
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We may collect this personal data by using cookies, server logs and other similar

© Phyonis Limited

technologies. We may also receive Technical Data about you if you visit other websites which may employ our cookies.

- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:
  - Analytics providers such as Google based outside the UK.
  - Credit and reference checking agencies.
  - Identity and Contact Data from publicly availably sources such as Companies House and the Electoral Register based inside the UK.

How we use your personal data

We will only use your personal data for the purposes we communicate to you and when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform specific actions in support of the contract we are about to enter into or have entered into with our clients, partners and third parties.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- To inform you of relevant activities and services from Phyonis Limited and our key partners.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to certain cookies (see below) sending third party direct marketing communications to you via email or text message (if any). You have the right to withdraw consent to marketing at any time by contacting us at: info@phyonis.com.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use 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/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you on our key contacts database.	Identity data. Contact data.	(a) Necessary for our legitimate interests to provide a service to new and existing clients as well as employees, contractors and job candidates.
To process your agreement including:	Identity data. Contact data.	(a) Performance of a contract with you.

© Phyonis Limited

(a) Manage payments, fees and charges. (b) Collect and recover money owed to us.	Financial data. Transaction data. Marketing and Communications data.	(b) Comply with a legal or regulatory obligation. (c) Necessary for our legitimate interests to keep our records updated (and pay monies owing or 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) Informing you of relevant product and service updates. (c) Sending our newsletter, invite to an event or take a survey.	Identity data. Contact data. Profile data. Marketing and Communications data.	(a) Necessary for our legitimate interests to provide our products and services. (b) Necessary for our legitimate interests to keep our records updated as to areas of interest and to study how interested parties use our services.
To deliver relevant website content and potential available services to you and measure or understand the effectiveness of the details we share with you.	Identity data. Contact data. Profile data. Usage data. Marketing and Communications data. Technical data.	(a) Necessary for our legitimate interests to study how interested parties, users, clients and potential clients use our services and thus to develop those services, to grow our business and to inform our marketing strategy.
To use data analytics to improve our website, services, marketing, client and potential client relationships and experiences.	Technical data. Usage data.	(a) Necessary for our legitimate interests to define types of interested parties for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy.
To make suggestions and recommendations to you about products, services,	Identity data. Contact data.	(a) Necessary for our legitimate interests to develop

© Phyonis Limited

events or updates that may be of interest to you.	Technical data. Usage data. Profile data.	our services and grow our business.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and communications.

You will receive marketing communications from us if you have requested information from us or entered into a contract for services from us or if you provided us with your details when you registered interest in one of our services and, in each case, you have not opted out of receiving that marketing.

Third party marketing – We do not sell your personal details to third party partners for marketing purposes.

Opting out

You can ask us to stop sending you marketing communications emails at any time by contacting the Director of Phyonis Limited at any time using the details set out in the “Contact details” section of this document, above.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of any contractual or legal relationship we have with you.

Cookies

We employ cookie technology to help protect our website and also to log visitors to our web site. Cookies are pieces of data that are often created when you visit a website, and which are stored in the cookie directory of your computer or mobile device. A number of essential cookies are created when you visit the Phyonis Limited website and the use of functional cookies and statistic cookies on the Phyonis Limited website is optional. You will be asked to select your cookie settings when you first access the Phyonis Limited website and again at least once every 365 days (depending upon your browser settings). You can change your functional cookie and statistic cookie settings at any time here: https://www.phyonis.com/change-cookie-settings.

To manage the cookies and similar technologies used and related consents, we use the consent tool "Real Cookie Banner". Details on how "Real Cookie Banner" works can be found at https://devowl.io/knowledge-base/real-cookie-banner-data-processing/. The legal basis for the processing of personal data in this context are Art. 6 (1) lit. c GDPR and Art. 6 (1) lit. f GDPR. Our legitimate interest is the management of the cookies and similar technologies used and the related consents.

Full details of the cookies that are used and how to change your cookie settings are contained in the Phyonis Limited Cookie Notice (see https://www.phyonis.com/cookie-notice). Please note that details of the individual services and cookies are provided when you access the change cookie

© Phyonis Limited

settings page on the Phyonis Limited website here: https://www.phyonis.com/change-cookie-settings and click on the "**Show service information**" links.

Please note that if you are less than sixteen (16) years old then you must only accept essential cookies on the Phyonis Limited website and if you wish to accept functional cookies and / or statistic cookies on the Phyonis website then you must ask the person who holds parental responsibility over you (and this person must be at least eighteen (18) years old) to accept them on your behalf.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some of the enhanced features of the Phyonis Limited website may become inaccessible or not function properly.

Log files

When you visit the Phyonis Limited website (https://www.phyonis.com) we collect web statistics concerning your visit, which are stored in a log file. Log files allow us to record visitors' use of the site. Log files are also used to detect potential harmful users which may be reported to the relevant authorities.

Disclosures of your personal data

We may have to share your personal data with relevant third parties for the operation of your contract with Phyonis Limited.

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.

International transfers

As a Data Controller, we will not transfer your personal data outside the UK without your consent.

Data security

We treat the privacy and security of the personal data we hold very seriously.

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 or confirmed data breach and will notify you and any applicable regulator of a data breach where we are legally required to do so.

Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider:

© Phyonis Limited

- 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
- the applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this aggregated information indefinitely without further notice to you.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please refer to the glossary below for more information.

If you wish to exercise any of the rights set out above, please contact the Director of Phyonis Limited using the details set out in the "Contact details" section of this document, above.

No fee is 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 reserve the right to charge a reasonable fee if we believe that your request is clearly repetitive or excessive.

Where we believe that a request is excessive, e.g. significant amounts of data are requested, we will attempt to clarify in more detail exactly what you are looking for.

Alternatively, we may 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 endeavour to respond to all legitimate requests within one month. Occasionally it may 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. In such cases we will respond within two months of the date we clarified your request or the fee to access the data was paid.

Your right to complain

You have the right to make a complaint at any time to the competent supervisory authority for data protection issues. In the UK, this is the Information Commissioner's Office (ICO). Contact details can be found at www.ico.org.

We would, however, appreciate the chance to understand and address your concerns before you approach the competent supervisory authority, so in the first instance, please contact the Director of Phyonis Limited using the details set out in the "Contact details" section of this document, above.

Glossary

© Phyonis Limited

DATA SUBJECT

A living natural person, who has rights regarding their personal data and can be identified through Personal Identifiable Information (PII).

DATA PROCESSING

The collection, storage, access, use, sharing, manipulation and deletion of personal data.

SUPERVISORY AUTHORITY

The national body that regulates the General Data Protection Regulations (GDPR) in an EU member state. In the UK, the Supervisory Authority is the Information Commissioner's Office (ICO), details of which can be located at www.ico.org.

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience.

We make sure we consider and balance any potential impact on you (both positive and negative) and your rights 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).

You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of a Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation to which we are subject.

THIRD PARTIES

Service providers who provide Information Technology (IT) and system administration services.

Professional advisers including: lawyers, bankers, accountants, auditors and insurers who provide: consultancy, legal, banking, accounting, auditing and insurance services.

HM Revenue and Customs (HMRC), regulators and other authorities based in the United Kingdom (UK) who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

As a Data Subject, you have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy, in an agreed machine-readable format, of the personal data we hold about you and to check that it is complete, current and we are lawfully processing it.

In certain situations, we may seek further clarification of your data access request, e.g. where the request is complex or sizeable.

© Phyonis Limited

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. Also known as the right to rectification.

Request erasure of your personal data. Also commonly known as the "right to be forgotten". This enables you to ask us to delete or remove 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.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

(a) if you want us to establish the data's accuracy.

(b) where our use of the data is unlawful but you do not want us to erase it.

(c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.

(d) you have objected to our use of your data (but please note that we will need to verify whether we have overriding legitimate grounds to use it).

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.

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.

Withdraw consent at any time where we are relying on your consent to process your personal data. 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 products or services to you. We will advise you if this is the case at the time you advise us of your request to withdraw your consent.

© Phyonis Limited

Change Record

Version	Date	High-Level Statement of Change
1-00	09-Jun-20	First version published.
2-00	03-Feb-21	Second version published. Added link references. Updated cookies section.
3-00	06-Aug-23	Third version published. Added explicit reference to the “Real Cookie Banner” consent tool. Updated text in section “International transfers”.
4-00	24-Apr-24	Fourth version published. Review resulting in no material changes.

© Phyonis Limited