

# ORSA PRIVACY POLICY

ORSA Projects Limited is committed to protecting the privacy of your personal information. This Privacy Policy explains how we handle information we collect about you and what we do with that information.

This Policy is incorporated into ORSA Projects Limited's Terms & Conditions and applies to information obtained by us through your use of the products and services we offer and any web services we offer.

ORSA Projects Limited collects information essential to its service provision and undertakings which, alone or in combination with other data, could be used to identify you, such as your e-mail address, name, physical address, telephone number, or employment information.

ORSA Projects Limited collect your Personal Information in a number of ways which include by telephone to our registered offices, by post or e-mail.

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

1. Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - enter a survey; or
  - Give us feedback or contact us.
2. 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 and other similar technologies.
3. Third parties or publicly available sources. We will receive personal data about you from various third parties and public sources as set out below:
  - 3.1 Technical Data from the following parties:
    - (a) analytics providers;
    - (b) advertising networks based inside the UK; and
    - (c) search information providers based inside the UK.
4. Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside the UK.
5. Identity and Contact Data from data brokers or aggregators based inside the UK.
6. Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the UK.

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 (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

1. Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
2. Contact Data includes billing address, delivery address, email address and telephone numbers.
3. Financial Data includes bank account and payment card details.
4. Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
5. We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

ORSA Projects Limited collects and uses your Personal Information as necessary to perform our contract with you as part of our services provision and in order to communicate with you about the services you use.

When you register with us and set up an account to receive our services, the legal basis for this processing is the performance of a contract between you and us.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Unless a longer retention period is required or permitted by law, we will only hold your Personal Information on our systems for the period necessary to fulfil the purposes outlined in this Policy, or until you request that the information be deleted in accordance with your right of erasure.

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

1. Where we need to perform the contract we are about to enter into or have entered into with you.
2. 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.
3. Where we need to comply with a legal obligation.



We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

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

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

We will still reserve the right to maintain a copy of Personal Information for legal, tax or regulatory purposes, and we will do so only as long as necessary to fulfil those legal, tax or regulatory purposes.

We will only disclose Personal Information to third party service providers where this is to assist us in meeting business or operating needs. These service providers may only access, process or store Personal Information pursuant to our instructions and to perform their duties to us, and in accordance with applicable laws and regulations.

To ensure that your Personal Information receives an adequate level of protection, we have put in place appropriate safeguards and procedures with the third parties we share your Personal Information with. This ensures your information is treated by those third parties in a way that is consistent with data protection laws.

ORSA Projects Limited is committed to taking appropriate steps to protect the Personal Information that we hold from misuse, loss, or unauthorised access. If you suspect any misuse or loss or unauthorised access to your personal information, please contact us immediately.

Our IT systems are designed to secure the Personal Information you provide on computer servers in a controlled, secure environment, with protections from unauthorised access, use or disclosure. When Personal Information is transmitted to other websites, it is protected through the use of encryption software.

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.

Our 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.

Cookies: 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

parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [COOKIE POLICY].

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

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 of the personal data we hold about you and to check that we are lawfully processing it.

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.

Request erasure of your personal data. 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:

1. If you want us to establish the data's accuracy.
2. Where our use of the data is unlawful but you do not want us to erase it.
3. 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.
4. You have objected to our use of your data but we 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 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 withdraw your consent.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

#### Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

Full name: James Bucknall

Email address: [jeb@orsa.uk](mailto:jeb@orsa.uk)

Postal address: 8 Shepherd Market London W1J 7JY

Telephone number: +44 (0) 20 3884 7105

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

You have rights in relation to your personal information. If you require further information, contact our Data Processing Officer who is listed on the DPO public register:

<https://ico.org.uk/ESDWebPages/Search>

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.

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.

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.

ORSA Projects welcomes any comments regarding this Policy document. Please contact us at: [info@orsa.uk](mailto:info@orsa.uk)

We keep our privacy policy under regular review. This version was last updated on 4 February 2025. 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.

This Privacy Policy will be communicated to all persons working under the control of the organisation and will be made available to interested parties on request and made available through all our web-based services.

ORSA Projects Limited

JAMES BUCKNALL

DIRECTOR

