

## DATA PROTECTION POLICY

### DATA POLICY AND PRIVACY NOTICE

This Document describes the categories of personal data we process and for what purposes. We are committed to collecting and using such data fairly and in accordance with the requirements of applicable data protection legislation.

#### 1.0 INTRODUCTION

- 1.1 This Document explains your privacy rights and how we gather, use and share your personal information. That includes the personal information we already hold about you now and the further personal information we might collect about you, either from you or from a third party. How we use your personal information will depend on the services we provide to you.
- 1.2 This Document provides information about how we use your personal information and will update any previous information we have given you about using your personal information (also referred to as personal data).
- 1.3 We are the controller of your personal information under applicable data protection legislation, unless otherwise stated in this Document or otherwise provided for in applicable data protection legislation.
- 1.4 If you have any queries regarding our use of your personal information, please contact us at [gary.logue@axiom-psl.co.uk](mailto:gary.logue@axiom-psl.co.uk) or by post at Gary Logue, Axiom Project Services Ltd, 226 West George Street. Glasgow. G2 2PQ.
- 1.5 If your personal details change or if you change your mind about any of your marketing preferences, please contact us at [gary.logue@axiom-psl.co.uk](mailto:gary.logue@axiom-psl.co.uk) or by post at Gary Logue, Axiom Project Services Ltd, 226 West George Street. Glasgow. G2 2PQ.
- 1.6 In this Document, the terms “we”, “us” and “our” refer to Axiom Project Services Limited (Registered No SC358148).

#### 2.0 YOUR PRIVACY RIGHTS

- 2.1 Any requests received by us will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner’s Office at [ico.org.uk](http://ico.org.uk)

Right to be informed	This Document informs you about the collection and use of your personal information.
Right to access	You have a right to request access to the personal information that we hold about you by making a “subject access request”.
Right of rectification	If you believe that any of the personal information that we hold about you is inaccurate or incomplete, you have a right to request that we correct or complete that personal information.
Right of erasure	If you wish us to delete the personal information that we hold about you, you may request that we do so in certain circumstances.
Right to restrict processing	You have a right to request that we restrict the processing of the personal information that we hold about you for specific purposes.
Right to object	You have a right to object to us processing your personal information in certain circumstances.
Right to portability	You have a right to obtain and reuse the personal information that we hold about you for your own purposes in certain circumstances.
Rights related to automated decision-making	Where we undertake any automated decision-making and profiling, you have certain rights in relation to such processing.

## DATA PROTECTION POLICY

### 3.0 HOW WE GATHER PERSONAL INFORMATION

We obtain personal information from a wide range of sources:

- 3.1 Directly from you or your business when you contact us in writing, by email, in person, by telephone, or by any other method.
- 3.2 From information you or your business have made publicly available.

### 4.0 HOW WE USE YOUR PERSONAL INFORMATION

#### 4.1 To respond and communicate

- 4.1.1 We use personal information to allow us to respond to you and communicate with you regarding your instructions, questions, comments, support needs, complaints or concerns.

#### 4.2 Using client information

- 4.2.1 When you become our client, we will collect, store and use the personal information that you provide to us in your instructions and during the course of our providing services.

- 4.2.2 We need to collect personal information so that we can perform our obligations under our service agreement with clients. We will use such personal information to:

- a) provide clients with advice, including communicating with them by email, letter and/or telephone, etc. in connection with the services that we provide;
- b) provide clients with advice in respect of the matter(s) upon which we are instructed to provide advice; and/or
- c) process and make payments in connection with such matter(s).

- 4.2.3 If clients do not provide us with all of the personal information that we need to collect in order to perform our contracted services, then this may affect our ability to provide such services.

- 4.2.4 We may also process personal information for purposes relating to the provision of services we provide including updating, reviewing and enhancing client records and undertaking analysis for management purposes.

#### 4.3 Business clients and other stakeholders

- 4.3.1 For business clients (including bodies corporate, public bodies and/or charities) and other stakeholders including suppliers, we will use personal information about key individuals in the business, so that we can operate and administer the services which we provide.

#### 4.4 Other Parties

- 4.4.1 We will process personal information of individuals who are not our client, but have a relationship with our client.

#### 4.5 Financial management and debt recovery

- 4.5.1 We may give personal information to and receive personal information from third parties where that is necessary to recover debts due by you to us, for example, credit reference agencies and sheriff officer or bailiff services.

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### 4.6 To market services to you

- 4.6.1 Where we have collected your personal information from you directly, an event or the website of your business, we collect, store and process your name; business address; email address and your image if contained in photographs from our events and seminars. If you attend one of our events, we may share your name and organisation details to other attendees either prior to or following the event, unless you ask us not to.
- 4.6.2 Where we wish to publish a photograph of you with other personal information online, including on social media, this may be accessed outside of the EU and we may seek to obtain your consent if we consider it to be necessary.
- 4.6.3 We process your personal information for marketing purposes to update you on matters which we believe will be of interest to you.
- 4.6.4 We may send you communications and/or invitations; ask you for your feedback on our events so that we can seek to improve; and grow our business by using your image and/or name in any promotional material that we publish.

### 4.7 Automated decision making and profiling

- 4.7.1 We do not use personal information to make decisions solely by automated means without any human involvement.

### 4.8 Online Activity

- 4.8.1 Our website may, from time to time, contain links to and from other websites operated by third parties. These are provided for your information and convenience only. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these websites.
- 4.8.2 We may collect information about your computer, including where available your IP address, operating system and browser type, for system and business administration and for usage monitoring.

## 5.0 OUR LEGAL BASIS FOR USING YOUR PERSONAL INFORMATION

- 5.1 We only use your personal information where that is permitted by the applicable data protection legislation. We only use personal information where:
  - a) we have your consent (if consent is needed);
  - b) we need to use the information to comply with our legal obligations;
  - c) we need to use the information to perform a contract with you, including taking steps to enter into a contract with you;
  - d) it is fair to use the personal information either in our interests or someone else's interests, where there is no disadvantage to you – this can include the provision of services; protection of the confidentiality, availability and integrity of our systems; managing and developing our business relationships; where it is in our interests to promote our services by sending clients communications with information for upcoming events and legal updates; inviting clients as guests to our events.
- 5.2 Where we have your consent, you have the right to withdraw it at any time.

## DATA PROTECTION POLICY

### 6.0 SHARING PERSONAL INFORMATION

- 6.1 Where necessary for the purposes of managing our working relationship with our clients, we may share personal data with our clients where you are providing information in respect of client matters.
- 6.2 Where we employ third party suppliers to provide services on our behalf, these suppliers may process personal data on our behalf as “processors” and are subject to written contractual conditions to only process that personal data under our instructions and protect it.
- 6.3 In the event that we do share personal information with external third parties, we will only share such personal data strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal data in accordance with those purposes.

### 7.0 SHARING PERSONAL INFORMATION

- 7.1 We will protect your personal information in order to prevent unauthorised access to, or use or disclosure of, your personal information through a number of organisational and technical security measures. Your personal information is stored on our systems to which access is both physically and electronically controlled.
- 7.2 For the purposes of IT hosting and maintenance, the personal information we hold is located on servers within the European Economic Area.

### 8.0 HOW LONG WE KEEP YOUR PERSONAL INFORMATION FOR

- 8.1 We will retain your personal information for as long as is required to comply with our obligations set out above, unless you ask us to return any copies of it to you or send it to a third party.

Signature:  Name: Gary Logue Date: 21 October 2025