

Executive Compass Business Consultants Limited

Privacy Notice

Introduction

This privacy policy sets out how Executive Compass uses and protects your personal data. This privacy policy is provided in a layered format so you can click through to the specific areas set out below.

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- 1. Important information and who we are**

Privacy policy

This privacy notice gives you information about how Executive Compass Business Consultants Limited collects and uses your personal data through your use of this website and in connection with our business, including any data you may provide when you contact us, instruct us to provide bid management, bid writing, consultancy or training services, use our bidtogether service, sign up to newsletters or marketing communications, attend meetings or calls with us, or otherwise engage with our services.

This website and our services are not intended for children and we do not knowingly collect personal data relating to children.

Controller

Executive Compass Business Consultants Limited is the controller and responsible for your personal data (collectively referred to as "Executive Compass", "we", "us" or "our" in this privacy policy).

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 (paragraph 9), please contact the DPO using the information set out in the contact details section (paragraph 10).

2. The types of personal data we collect about you

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

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, title, employer, job title and, where relevant, signature details.
- **Contact Data** includes business address, billing address, email address and telephone numbers.
- **Financial Data** includes bank account details and payment information where relevant to invoicing and payment collection.
- **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, browser type and version, time zone setting and location, operating system and platform, and other technology on the devices you use to access this website.
- **Profile and Correspondence Data** includes enquiries, service history, tender-related correspondence, meeting notes, call recordings or transcripts (where used), feedback, survey responses, and records of your interactions with us.
- **Tender and Bid Data** includes personal data contained in tender documents, bid responses, supporting information, CVs, case studies, references, organisational charts, policies, pricing submissions and other materials provided to us by or on behalf of clients in connection with our services.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.
- We may also process special category personal data or criminal offence data where this is contained in materials provided to us by or on behalf of a client and is necessary for the provision of our services, for example where tender or

compliance documents refer to health information, equality data, DBS status or other background information. We do not seek to collect such data unless it is necessary for the relevant engagement.

- 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.

3. How is your personal data collected?

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

- **Direct interactions.** You may give us your personal data by filling in forms, corresponding with us by post, phone, email or otherwise, meeting with us, requesting a quotation or proposal, entering into a contract with us, subscribing to newsletters, or providing feedback.
- **Client instructions and project materials.** We may receive personal data from our clients or from persons acting on their behalf where that personal data is contained in tender documents, bid materials, supporting documents, policies, CVs, references, pricing submissions, meeting notes, recordings or transcripts, and other project materials.
- **AI-supported services.** Where we provide AI-supported services, including bidtogether, we may receive and process information uploaded by clients or collected during information-gathering calls, including transcripts and draft content generated from that material.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data by using cookies, server logs and other similar technologies. Please see our cookie policy <https://executivecompass.co.uk/cookie-policy/> for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from analytics providers, IT and hosting providers, payment providers, CRM providers, public procurement portals, publicly accessible sources such as Companies House or LinkedIn, and from commissioning authorities where relevant to the services.

4. How we use your personal data

Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform a contract we are about to enter into or have entered into with you, including to provide bid

management, bid writing, consultancy, training, bidtogether and related support services.

- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to manage client relationships, deliver and improve our services, analyse and develop our AI-supported drafting processes, protect our business, prevent fraud, recover debts, and send relevant business-to-business marketing communications. We make sure we consider and balance any potential impact on you and your rights before we process your personal data for our legitimate interests.

Where we process personal data on behalf of a client as part of delivering services to that client, ECBC generally acts as processor and the relevant client acts as controller. In those cases, the client is responsible for identifying the appropriate lawful basis for that processing.

- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **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.

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 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 and retention period
To respond to enquiries and provide proposals or quotations	(a) Identity (b) Contact (c) Profile and Correspondence	Legal basis: Legitimate interests (to respond to enquiries and develop our business) Retention: for up to 2 years from last contact unless an engagement proceeds.
To register you as a client or supplier	(a) Identity (b) Contact (c) Transaction	Legal basis: Performance of a contract with you Retention: for the duration of the relationship and for 6 years afterwards.
To provide bid management, bid writing, consultancy, training and related support	(a) Identity (b) Contact (c) Profile and Correspondence (d)	Legal basis: Performance of a contract with you; Legitimate interests (to deliver and improve

services	Tender and Bid Data (e) Transaction	services) Retention: Usually for 6 years after the end of the relevant engagement, unless a different period is required by law, contract or the nature of the engagement.
To provide AI-supported services, including bidtogether	(a) Identity (b) Contact (c) Profile and Correspondence (d) Tender and Bid Data (e) Technical	Legal basis: Performance of a contract with you; Legitimate interests (to use appropriate tools and improve service delivery) Retention: For as long as necessary for the relevant engagement and afterwards in line with our standard project retention periods, unless earlier deletion is required by contract or law.
To process and manage payments, fees and charges and collect money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	Legal basis: Performance of a contract; Legitimate interests (to recover debts due to us) Retention: 6 years for tax and accounting purposes.
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) Profile (d) Marketing and Communications	Legal basis: Performance of a contract with you; Necessary to comply with a legal obligation; Necessary for our legitimate interests (to keep our records updated and manage our relationship with you) Retention: We will retain this data for the duration of the relationship + 2 years.
To enable you to partake in a surveys, research or competitions	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	Legal Basis: Performance of a contract with you; Necessary for our legitimate interests (to study how customers use our products/services, to improve our profiling tools, to develop them and grow our business) Retention: We will retain survey/competition data for 12

		months unless longer retention is required for anonymised research.
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	Legal Basis: 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); Necessary to comply with a legal obligation Retention: Data will be retained for as long as necessary for security and audit purposes, generally not more than 2 years.
To deliver relevant website content targeted communications and measure or understand the effective of and measure or understand advertising.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Legal Basis: Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) Retention: Retained in accordance with cookie/analytics policies (e.g. up to 25 months).
To use data analytics to improve our website, services, and customer relationships	(a) Technical (b) Usage	Legal Basis: Necessary for our legitimate interests (to define types of customers for our products and services, to improve our website and assessment tool and develop services, to develop our business and to inform our marketing strategy) Retention: Analytics data retained for up to 25 months or anonymised sooner.
To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and	Legal Basis: 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

(e.g. offers, workshops, further training opportunities)	Communications	Retention: Data retained until you opt out or withdraw consent.
To carry out market research and product development using aggregated and anonymised survey data	(a) Profile (b) Usage	Legal Basis: Legitimate interests (to study how customers use our profiling and training, and to enhance product development). Retention: Personal data is anonymised after 12 months; anonymised data retained indefinitely.

Direct marketing

You may receive marketing communications from us if you have requested information from us, purchased services from us, or otherwise engaged with us, and you have not opted out where we are permitted to contact you on that basis.

We may use your Identity, Contact, Technical, Usage and Marketing and Communications Data to form a view on what services may be relevant to you, such as bid writing support, consultancy, training or related services.

Third-party marketing

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

Opting out of marketing

You can ask to stop sending you marketing communications at any time by contacting us at info@executivecompass.co.uk.

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes for example relating to a service you have purchased, updates to our Terms and Conditions, checking that your contact details are correct.

Tender and project data

Where we provide bid management, bid writing or related consultancy services, we may process personal data contained in tender documents, CVs, references, policies, case studies, correspondence, call notes, recordings, transcripts and other supporting documents provided by or on behalf of a client. In many cases, we process this personal data on the client's behalf in connection with the preparation, review or support of a tender or other

submission.

Use of AI-supported tools

Where appropriate, we may use AI-supported tools, including drafting and transcription tools, to support the delivery of our services. Where we do so, we seek to ensure that those tools are used in accordance with our contractual, confidentiality and data protection obligations and that appropriate safeguards are in place.

Cookies

For more information about the cookies we use and how to change your cookie preferences, please see <https://executivecompass.co.uk/cookie-policy/>.

5. Disclosures of your personal data

We may share your personal data where necessary with the parties set out below for the purposes set out in the table *Purposes for which we will use your personal data* above.

- service providers who provide IT, cloud hosting, data storage, CRM, email, website, analytics, payment processing, document management, transcription, AI-assisted drafting or other business support services;
- professional advisers including lawyers, accountants, auditors and insurers;
- our banks and payment service providers;
- commissioning authorities, procurement portals or other third parties where disclosure is necessary to perform our services for a client or to support a submission process;
- subcontractors, consultants or reviewers engaged by us in connection with the provision of services, subject to appropriate confidentiality and data protection obligations;
- HMRC, regulators, law enforcement agencies and other authorities where disclosure is required by law or necessary to establish, exercise or defend legal claims; and
- third parties to whom we may choose to sell, transfer or merge parts of our business or our assets, or with whom we may merge.

Where we use third-party providers to support AI-assisted services, those providers may process personal data strictly for the purpose of enabling us to perform our services.

6. International transfers

Some of our external service providers may be based outside the UK, or may store or access personal data outside the UK. This may include providers of cloud hosting, CRM systems,

analytics, transcription tools, AI-assisted drafting tools and other business support systems.

Whenever we transfer personal data outside the UK, we ensure a similar degree of protection is afforded to it by implementing appropriate safeguards. These may include transferring personal data only to countries recognised as providing an adequate level of protection, or putting in place the UK International Data Transfer Agreement (IDTA) or the UK Addendum to the EU Standard Contractual Clauses, together with any transfer risk assessment required by law.

To obtain a copy of the safeguards used for international transfers, please contact us (see section 10).

7. 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.

Where we use AI-supported tools or cloud-based systems, we seek to ensure that appropriate technical and organisational measures are in place to protect personal data and restrict its use to the purposes for which it was provided.

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.

8. Data retention

How long will you use my personal data for?

Details of the likely retention periods for different categories of personal data are set out in the table in paragraph 4 above. If it is not possible to specify the precise retention period in advance, we will retain the data for as long as necessary to fulfil the relevant purpose, taking into account legal, regulatory, contractual and business requirements.

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, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see paragraph 9 below for further information.

In some circumstances we will 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 information indefinitely without further notice to you.

9. Your legal rights

You have a number of rights under data protection laws in relation to your personal data.

These rights may apply differently depending on whether Executive Compass is acting as controller of your personal data or processing personal data on behalf of a client. Where we are acting as processor on behalf of a client, we may need to refer your request to the relevant client.

You have the right to:

- Request access to your personal data (commonly known as a "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 in certain circumstances. 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) 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.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see [OPTING OUT OF MARKETING](#) in paragraph 4 for details of how to object to receiving direct marketing communications).

- 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 (see the table in section 4 for details of when we rely on your consent as the legal basis for using your 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.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful but you do not want us to erase it;
 - 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; or
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us.

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.

10. Contact details

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact our DPO in the following ways:

- Name: Matthew Walker
- Email address: matthew@executivecompass.co.uk
- Postal address: Studio 5, The Kiln, Hoult's Yard, Walker Road, Newcastle upon Tyne, England, NE6 2HL

11. Complaints

You have the right to make a complaint to the Information Commissioner's Office (ICO), the UK regulator for data protection issues. We would, however, appreciate the chance to deal with your concerns first, so please contact us in the first instance.

12. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

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, for example a new address or email address.

13. 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.