

Flourish CSR Privacy Policy

Last updated: 13 June 2025

Flourish CSR is a responsible business consultancy committed to protecting your privacy and personal data. This policy explains how we collect, use, store, and share your personal information in compliance with the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018.

1. Who We Are

Flourish CSR (referred to as "we", "us", or "our" in this policy) is a micro-entity, a responsible business consultancy. Our primary contact for data protection matters is Louise McCabe, Director who can be reached at info@flourishcsr.com.

2. The Data We Collect About You

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.
- **Contact Data:** Includes email address, telephone numbers, business address.
- **Professional Data:** Includes job title, company name, industry sector.
- **Communication Data:** Includes your preferences in receiving marketing from us and your communication preferences.
- **Technical Data:** Limited to website usage statistics (e.g., via anonymous analytics), if applicable. We do not use cookies that track personal data without consent.

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

3. How Your Personal Data is Collected

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

- **Direct interactions:** You may give us your Identity, Contact, and Professional Data by corresponding with us by post, phone, email, or otherwise. This includes personal data you provide when you:
 - Enquire about our services.
 - Engage us for consulting services.
 - Subscribe to our newsletters or publications.
 - Meet us at events or through networking.
- **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources such as business directories, professional networking sites (e.g., LinkedIn), or company websites.

4. How We Use Your Personal Data

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:

- **To perform the contract:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate Interests:** 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. This includes for business development, relationship management, and service improvement.
- **Legal Obligation:** Where we need to comply with a legal or regulatory obligation.

We use your data for purposes such as:

- Providing our consultancy services to you.
- Managing our relationship with you, which will include:
 - Notifying you about changes to our terms or privacy policy.
 - Asking you to leave a review or take a survey.
- Occasionally sending you relevant updates, newsletters, or information about our services that we believe may be of interest (you can opt-out at any time).
- Administering and protecting our business and website (if applicable).

5. How We Share Your Personal Data

We will not sell or rent your personal data to third parties. We may share your personal data with:

- **Service providers:** Third-party service providers who assist us in operating our business (e.g., IT support, accounting services). We only share the necessary data and ensure they are also GDPR compliant.
- **Professional advisors:** Including lawyers, bankers, auditors, and insurers who provide professional services to us.
- **Regulatory bodies:** When required by law or regulation.

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.

6. International Transfers

We primarily store and process your personal data within the UK or European Economic Area (EEA). If any of our service providers transfer your data outside the UK/EEA, we will ensure it is protected by appropriate safeguards, such as standard contractual clauses approved by the ICO.

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.

8. Data Retention

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

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 requirements.

9. Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- **Request access** to your personal data.
- **Request correction** of your personal data.
- **Request erasure** of your personal data.
- **Object to processing** of your personal data.
- **Request restriction of processing** your personal data.
- **Request transfer** of your personal data.
- **Withdraw consent** at any time where we are relying on consent to process your personal data.

You can learn more about your rights on the Information Commissioner's Office (ICO) website (www.ico.org.uk).

If you wish to exercise any of the rights set out above, please contact us at info@flourishcsr.com.

10. Changes to This Privacy Policy

We keep our privacy policy under regular review. This version was last updated on 12 June 2025.