



## Welcome to the Phenix Digital Privacy Notice

This Privacy Notice is designed to help you understand everything you need to know about the what, why and how's of our data gathering and processing operations, and what your legal rights are.

We hope you'll take some time to read this document; we've tried to keep it all as simple as possible and we will keep you informed if there are any changes to the way we process your personal data in the future, before making them.

Phenix Digital takes its responsibilities to protecting your data very seriously and we do advise you get to know our practices – If there's anything in this policy you don't understand or if you want to ask any questions, please feel free to contact us using any of the details below.

### Who are we?

We are Phenix Digital, a Digital Agency that specialise in Website Design and Development, Logo Design, Applications, Digital Brochure's, Photography and Videography. We are a **UK limited company** registered in **England** at Creative Industries Centre, Wolverhampton Science Park, Wolverhampton, WV10 9TG and our company registration number is **07703903**.

In this document Phenix Digital will sometimes be referred to as "we".

### What kind of personal data might we ask you to provide?

Phenix Digital will only ever ask for personal data if it is required for a specific purpose; with that in mind we have created a full list of all the kinds of personal data that we may ask individuals to provide in order to achieve those purposes. The kinds of personal data we may collect in order to facilitate the delivery of our goods and services are:

Your name, address, telephone number, email address, bank details (for payments), VAT information, DBS checks, driver's licence or passport information, and information about next of kin (where appropriate)

If you have provided your personal data to apply for a job at Phenix Digital we may also ask you to provide information about your work and educational history.

### Why do we collect personal data?

We will use personal data firstly to fulfil any contractual obligations that exist between us and yourself; where we request personal data be provided to meet the terms of any such contract you will be required to provide the relevant personal data or we will not be able to deliver the goods and/or services you want. In such cases the lawful basis of us processing the personal data is that it is necessary for the performance of a contract.

We may also process your personal data in accordance with our legitimate business interests; this is on the considered measure that we need the personal data to achieve the various purposes and that it could be reasonable for an individual to expect their data to be used for those purposes.

Our data processing activities conducted on the lawful basis of 'legitimate interests' are:

- To provide you with goods and services you are looking for
- To manage marketing strategies; online media such as Facebook, Instagram or twitter, text messaging
- To inform you of other goods and services we provide, or offers that may interest you (direct marketing)
- To improve the quality of the services we offer, and to better understand our customers' needs by requesting feedback, or requesting you review the services we have provided, or we may send survey forms that we ask you to complete
- For use in proportional material to market our business

We may also process your personal data in order for Phenix Digital to comply with our various legal obligations; this might include:

- Providing for financial commitments between us and yourself, or to relevant financial authorities
- Cooperating with relevant authorities for reporting criminal activity, or to detect and prevent fraud
- To carry out required business operations and due diligence; e.g. administration, security, reorganisations, investment or corporate/asset sales
- To comply with industry regulatory requirements and any self-regulatory schemes
- To contact you in case of an emergency or threat to your well being

Where we process special categories of personal data, other than where we have your consent to do so we shall be processing this data on one or more of the following lawful basis:

- It is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law

#### Where did we obtain your personal data?

Other than collecting data directly from you we can gather it from other sources, such as:

- From third party organisations, which can mean your personal data has been provided directly by another company for a specific purpose.
- We are also act on recommendations whether this be from current clients or by other methods of referral or business networking.

#### Who will we share your information with?

**We may share your personal data with the other members of our group of companies, which includes any subsidiary or the holding company (each as defined by the Companies Act 2006) of Phenix Digital.**

In order to achieve the above stated purposes for which we process your personal data, we may need to share your personal data with various third-party service providers who act as data processors.

We may share your personal data with third party organisations acting as data controllers or with specific individuals, groups or other organisations who act as neither data controllers nor data processors, but only where we are either legally require to do so by law or where doing so is necessary to achieve the intended stated purpose of processing the data

In the event that we sell or reorganise our business, or if otherwise required by law or by an authorised regulator, we may transfer your personal data as a part of the general business data to the relevant parties.

#### Where is my data going to be stored?

Phenix Digital will not transfer your personal data to any country outside the European Union (EU) other than those that have been granted an adequacy decision under the General Data Protection Regulation (GDPR).

Any personal Employee data is held at [www.Charliehr.com](http://www.Charliehr.com) and all employee's are required to 'onboard' following a link sent to their email. The data is password protected to the individual but is also assessible to the HR and Accounts Director, the Managing Director and the Director of Phenix Digital. Should the employee have a line manager, they may be able to access certain parts of the employee's data such as holiday entitlement and PDR reviews but not financial detail. For more information on how Charlie HR keep your details safe please follow this link [https://www.charliehr.com/hr-online/security/security\\_measures](https://www.charliehr.com/hr-online/security/security_measures)

Phenix Digital may be required to transfer your personal data to organisations who intend to transfer the data outside the EU. Where such transfers of data take place, we shall ensure that at least one of the following control measures are in place:

- a) Contracts are in place between the parties involved that ensure the recipient organisation has a suitable standard of data protection in place.

#### How long will we keep your data for?

We will keep your personal data only for as long as required in order to achieve the purposes for which it was gathered, in line with this privacy notice.

For determining when personal data should be erased we shall take into consideration the amount of and sensitivity of the personal data we have, the amount of harm that could be caused by a data breach, the benefits of the purposes the data is being used for and any legal requirements that we are bound to.

You may request that we erase your personal data at anytime, though in cases where there is a remaining relevant or legal reason why we are required to keep the data we may opt to restrict the amount of processing being conducted to what is absolute necessary in line with your legal rights in order to minimise the impact the processing with have.

Health and safety legislation places obligations on organisations to retain medical records for 40 years from the date of last entry:

- a) Under the Control of lead at Work Regulations 1998
- b) As specified by the Control of Substances Hazardous to Health Regulations 1999
- c) Under the Control of Asbestos at Work Regulations 1987/1998

Where the lawful basis of our processing is based on protection of vital interests and insofar as the above obligations apply Phenix Digital will retain your personal data for 40 years.

### Your Rights, Our Responsibility

There are several rights granted to you immediately upon providing us with your personal information; some of these are mentioned above. We'd like you to know that at Phenix Digital we take your rights as a Natural Person seriously and will always conduct ourselves in a way that is considerate of our responsibility to serve your legal rights.

#### You have the Right of Access

This grants you the right to confirm whether or not your personal data is being processed, and to be provided with relevant details of what those processing operations are and what personal data of yours is being processed.

If you would like access to the personal data we have about you, we ask that you contact us by using any of the details below.

#### The Right to Rectification

This one is fairly straight forward; if you notice that the data we have about you is inaccurate or incomplete, you may request we rectify the mistake. We will make every effort to respond to requests of this type immediately.

#### The Right to Objection

The right to object is a basic freedom all democracies enjoy. If you wish to object to the way we use, or have used, your personal data you may do so freely.

#### The Right to Portability

This is a legal right afforded to you that states we must pass on all of the details you have provided to us in a machine readable format, either to your or to another provider of your choosing.

#### The Right to Complain

We will always try to maintain the highest standards and encourage the confidence our customers have in us as an organisation. In order that we can achieve this we do request that any complaints be first brought to our attention so we can properly investigate matters; if however you would like to complain about Phenix Digital to a supervisory authority you may do so by contacting the Information Commissioners Office on 0303 123 1113, or anyone of the other reporting methods listed on their website - <https://ico.org.uk/concerns>

### Our contact details

If you wish to get in touch with Phenix Digital please do so with any of the following contact details:

Phenix Digital

Creative Industries Centre

**Wolverhampton Science Park**

**Wolverhampton**

**WV10 9TG**

T: 01902 837417

@: [info@phenixdigital.co.uk](mailto:info@phenixdigital.co.uk)