BENEFFREY
Consulting

Privacy Notice
31 August 2026

Version Control

Version	Author	Date	Comments
00-01	Iain C. Steel	31/08/2023	Draft for review
01-01	Iain C. Steel	05/09/2023	Approved for issue
02-01	Iain C. Steel	30/08/2024	General review and update throughout
03-01	Iain C. Steel	12/08/2025	General review and update throughout
04-01	Iain C. Steel	31/08/2026	to reflect current UK GDPR and ICO guidance, including revised data protection terminology, enhanced transparency regarding processors, international transfers, AI-assisted processing, personal data breach management, data retention and security measures, strengthened lawful basis explanations, and minor drafting amendments for clarity, consistency and accuracy.

Contents

Version Control....2
Scope of this Notice....4
Beneffrey Consulting Ltd Privacy Notice....4
Definitions of Personal Data Types:....4
Data Protection Principles....5
The type of personal information we collect....5
How we get the personal information and how we will use it....5
Artificial Intelligence....6
Lawful bases of processing your information:....6
Sharing of Information....6
Data Processors....7
International Transfers....7
How we store your personal information (including retention and security)....7
Your data protection rights....8
Website....8
Related Policies....8
How to complain....9

Scope of this Notice

The operational approach of Beneffrey Consulting involves cooperative engagement with a variety of collaborators, who may be independent or work for other firms (acting as sub-contractors). Anyone brought into association with Beneffrey Consulting, regardless of being a direct employee or functioning under Beneffrey Consulting's guidance, will be denoted as "Consultant(s)" in this notice. In circumstances where a specific area of this notice is only applicable to Consultants employed as staff or Directors of Beneffrey Consulting, this will be differentiated as referring to a directly employed Consultant.

Beneffrey Consulting Ltd Privacy Notice

This Privacy Notice, together with any agreed contractual terms and any documents referred to within those agreements, explains how Beneffrey Consulting Ltd collects, uses, stores, shares and protects personal data, and the rights of individuals whose personal data we process.

Beneffrey Consulting Ltd is a private limited company registered in Scotland, company registration number SC770479.

Our contact details

Name:	Beneffrey Consulting Ltd.
Address:	124b Springkell Avenue Glasgow G41 4EU
Phone Number:	07968 331 809
E-mail:	iain.steel@beneffrey.com

This notice is intended to help you to understand;

(i) The type of personal information we collect
(ii) How we get the personal information and how we will use it
(iii) Lawful bases of processing your information
(iv) Sharing of Information
(v) How we store your personal information
(vi) Your data protection rights
(vii) How to complain

This Privacy Notice will be reviewed at least annually and whenever there are significant legislative, regulatory or operational changes affecting the processing of personal data. Please review this Privacy Notice regularly to understand any changes that may be made in our procedures from time to time.

Beneffrey Consulting is committed to the UK GDPR principles of lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity, confidentiality and accountability.

Definitions of Personal Data Types:

Personal data
Information relating to identifiable individuals, such as current and former Consultants, current and former employees, clients and suppliers.

Special Category Personal Data
Certain categories of personal information receive additional legal protection under UK GDPR. These include information relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data used for identification, health data and information concerning a person's sex life or sexual orientation.

Beneffrey Consulting does not normally process Special Category Personal Data except where this is necessary for employment, legal or contractual purposes, or where another lawful basis under Article 9 UK GDPR applies.

Criminal Offence Data
Beneffrey Consulting does not routinely process information relating to criminal convictions or offences. Where such information is processed, it will only be where permitted by law and where appropriate safeguards are in place.

Data Protection Principles

Beneffrey Consulting processes personal data in accordance with the UK GDPR principles of lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity, confidentiality and accountability.

The type of personal information we collect

The personal data we collect will depend on the nature of the services we are contracted, or otherwise engaged, to provide and the administration of such. This may include the following:

- Personal identifiers, contacts and characteristics to allow us to conduct and administer our normal business activities. For example; Contact details (including name, job title, address, phone number(s) and email address(es)), banking and financial details (to pay Consultants and suppliers);
- Professional information (such as job title, work history, experience and qualifications) for Consultants and prospective Consultants who may be involved in selection and engagement of Consultants, work allocation or bidding for new opportunities;
- Personal identifiers, contacts and characteristics to allow us to contact clients, prospective clients, Consultants and suppliers about future events/seminars, updates or other news articles. For example; Contact details (including name, job title, address, phone number(s) and email address(es)). If you do not want to receive updates, you may remove yourself from any updates by contacting us.

How we get the personal information and how we will use it

Most of the personal information we process is provided to us directly by you in the normal course of conducting our business. For example, by you providing contact information in relation to a matter, by engaging with Beneffrey Consulting as a prospective Consultant, sub-contractor, or supplier.

Information we collect about you from others
Information may be passed to us by third parties in the course of providing our professional services. For example, Public sources (e.g. Companies House), professional services firms related to your engagement (e.g. lawyers, cost consultants). Such information will only be held and processed to the extent is necessary to conduct our normal business with you.

Information collected from you relating to other individuals
In the course of delivering our services, it may become necessary for us to collect and utilise personal data about you, your officers, employees and/or wider third parties. If you provide us with personal data concerning your officers or employees, you confirm that you are authorised to do so. You should take the necessary steps to ensure that these individuals are informed about how their data will be used by us.

Use of information
Wherever its source, we will hold and use personal information in the following ways:

- To communicate with you during the normal course of providing our services. This may include providing training, consultancy, support and dealing with enquiries.
- Provide you with information about future events/seminars, updates or other news articles. Beneffrey Consulting does not operate marketing mailing lists. Any occasional business

communications will be proportionate, relevant to our professional relationship and, where required, sent only with the appropriate lawful basis under UK GDPR and PECR.
- Verification of information in the sourcing and engagement of Consultants.
- To seek advice from third parties in connection with your requirements, for example; lawyers, cost consultants, specialist consultancy.
- Respond to any complaint.
- To prevent or comply with applicable laws, regulations, guidance or obligations (e.g. anti-money laundering, bribery and corruption investigations).

We will only collect and process personal data that is adequate, relevant and limited to what is necessary for the purposes for which it is processed. We take reasonable steps to ensure personal data is accurate and, where necessary, kept up to date.

Artificial Intelligence

Beneffrey Consulting may make limited use of Artificial Intelligence (AI) tools to support drafting, research, analysis or administrative activities. Personal data will only be entered into AI systems where appropriate contractual, technical and organisational safeguards are in place and such use is permitted by law, client requirements and our internal Information Security Policy.

Lawful bases of processing your information:

Depending upon the nature of our relationship with you, we may rely upon one or more of the following lawful bases for processing your personal data:

a) Your consent. You are able to remove your consent at any time. You can do this by contacting:

Privacy Contact:	Iain Steel
Title:	Director of Procurement & Business Transformation
Name:	Beneffrey Consulting Ltd.
Address:	124b Springkell Avenue
	Glasgow
	G41 4EU
Phone Number:	07968 331 809
E-mail:	iain.steel@beneffrey.com

b) We have a contractual obligation.
c) We have a legal obligation.
d) We have a vital interest.
e) We have a legitimate interest.

Where processing is based on legitimate interests, we will balance our legitimate business interests against your rights and freedoms before processing your personal data.

In the event that there is a requirement specific and/or additional consent to use your personal data, we will contact you to ask for such consent. As above, if consent is the basis on which we will process your personal data is processed, you are able to remove your consent at any time.

Sharing of Information

We may share information with independent Consultants or Consultants who work for other firms (acting as sub-contractors). In this event, information will only be disclosed or shared with the express consent of the client (for example, where Beneffrey Consulting have agreed to engage additional flexible support to increase capacity in the provision of services).

In such circumstances, these Consultants will be considered our suppliers or sub-contractors, and they will use any data for the purposes of providing services to us (or directly to our clients on our behalf). This will be subject to appropriate due diligence, consent of the client and will be subject to a contractual agreement that includes appropriate data security provisions for the client, the Consultant and for Beneffrey Consulting.

There are potentially other times data may be shared on occasion, including, but not limited to:

- Wider consultancy and/or expert support and advice, e.g. lawyers, cost consultants, to obtain advice relating to the client requirements.
- Disclosures to law enforcement agencies, where required by law.
- Beneffrey Consulting's professional indemnity insurer in the event a claim is made against us.

We will not disclose (or sell) your personal information to any other third parties for marketing purposes.

Data Processors

Beneffrey Consulting may use carefully selected third-party service providers to support the delivery of our services, including providers of cloud storage, email, accounting, document management, IT support and cybersecurity services. These organisations will process personal data only on our documented instructions and under appropriate contractual safeguards.

International Transfers

Beneffrey Consulting does not routinely transfer personal data outside the United Kingdom. Where an international transfer is necessary, we will ensure that appropriate safeguards are in place in accordance with UK GDPR, including the use of adequacy regulations or approved contractual safeguards where required.

How we store your personal information (including retention and security)

How long we keep your data for
We will store your data, typically in electronic files, for the duration necessary to accomplish the intended purposes for which the information was gathered. This retention period may also be determined by legal obligations or applicable contractual and legal requirements you have with us. For example:

- To undertake the contracted, or otherwise engaged, scope of work. Typically, we would expect to retain documentation relating to a procurement matter for a minimum of seven years following completion of the engagement unless a longer retention period is required by law, regulation, contractual obligation or to establish, exercise or defend legal claims.
- To maintain a record of Consultants engaged for client work and records relating to their engagement and/or for the purpose of bidding for such client work
- To maintain a register of Consultants for bidding and client work
- To comply with any legal obligations
- To defend claims against us or our professional indemnity insurance.

At the end of any retention period, data will be securely deleted or anonymised from our systems, laptops, desktops and cloud backup systems.

Security of your data
We acknowledge the inherent value of your data and are committed to safeguarding it whilst it is in our care.

To protect personal data we implement appropriate technical and organisational measures including access controls, encryption, secure cloud services, endpoint protection, multi-factor authentication where appropriate, backups and regular security updates. Similarly, we maintain rigorous confidentiality standards, including such safeguards as firewalls, anti-virus protection and data encryption.

Personal Data Breaches
Where required by UK GDPR, breaches will be reported to the Information Commissioner's Office and affected individuals within the applicable statutory timescales.

Your data protection rights

Under data protection law, you have rights including:

- **Your right of access -** You have the right to ask us for copies of your personal information.
- **Your right to rectification -** You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure -** You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing -** You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing -** You have the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability -** You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- **Rights relating to automated decision-making and profiling** – We do not routinely make decisions based solely on automated processing that produce legal or similarly significant effects.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. If you wish to make a request you can do this by contacting:

Contact:	Iain Steel
Title:	Director of Procurement & Business Transformation
Name:	Beneffrey Consulting Ltd.
Address:	124b Springkell Avenue Glasgow, G41 4EU
Phone Number:	07968 331 809
E-mail:	iain.steel@beneffrey.com

Website

The Beneffrey Consulting website may occasionally include hyperlinks to external websites over which we have no authority, and these websites are not governed by this Notice. We bear no responsibility or liability for the privacy notices or statements of these external sites. Should you choose to visit other websites via the provided links, we strongly advise that you review their privacy notices and policies prior to disclosing any personal information.

At the time of publication Beneffrey Consulting does not use cookies for advertising. Should this change in the future, our website will be updated accordingly and, where required, appropriate cookie controls will be implemented.

Related Policies

This Privacy Notice should be read alongside Beneffrey Consulting's Information Security Policy and any client-specific confidentiality requirements.

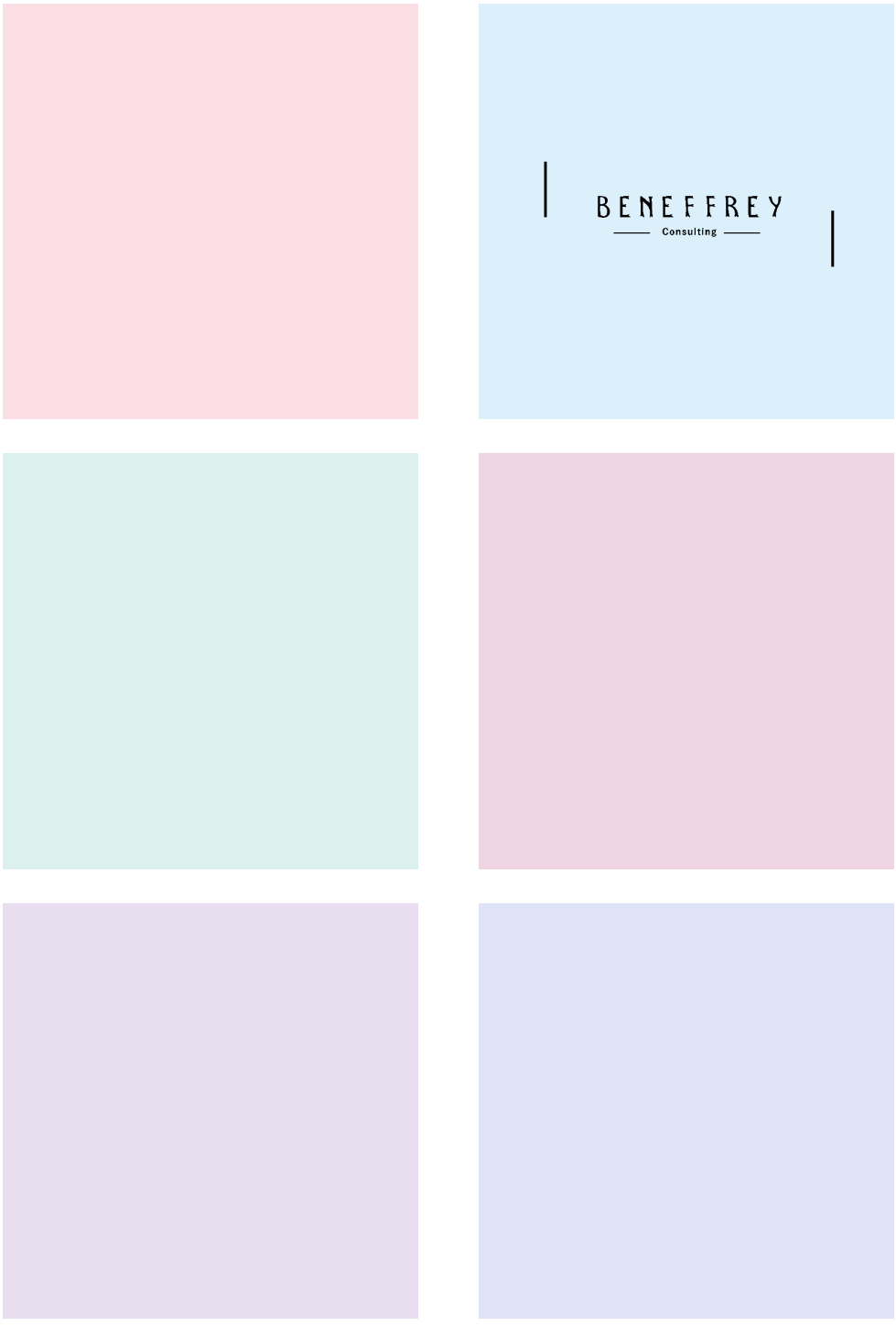
How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at:

Contact:	Iain Steel
Title:	Director of Procurement & Business Transformation
Name:	Beneffrey Consulting Ltd.
Address:	124b Springkell Avenue Glasgow, G41 4EU
Phone Number:	07968 331 809
E-mail:	iain.steel@beneffrey.com

You can also complain to the Information Commissioner's Office if you are unhappy with how we have used your data. The ICO's address is as follows:

Name:	Information Commissioner's Office
Address:	Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF
Helpline number:	0303 123 1113
ICO website:	https://ico.org.uk



Any reference in this document to ‘BCL’, ‘Beneffrey’ or ‘Beneffrey Consulting’ is to be construed as a reference to the entity Beneffrey Consulting Ltd.

Beneffrey Consulting Ltd is a private limited company registered in Scotland, company registration number SC770479

https://beneffrey.com/contact.html

Registered office and trading address:

Beneffrey Consulting Ltd
124b Springkell Avenue
Glasgow
G41 4EU