

# Privacy Notice

How Echelon Strategic Advisory Limited uses personal information

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## 1. Who we are and how to contact us

Echelon Strategic Advisory Limited (ESA) is a UK consultancy offering strategic advisory, resilience and cyber incident exercising services. Where ESA decides why and how personal information is used, ESA is the data controller.

Echelon Strategic Advisory Limited | Company number 16714655 | Registered office: 55 Allerton Road, Woolton, Liverpool, Merseyside, L25 7RF, United Kingdom.

Privacy enquiries, rights requests and complaints: contact our Data Protection Lead, Matt Moon, by post at the address above or by email at [ENQUIRIES@ESAGLOBAL.CO.UK](mailto:ENQUIRIES@ESAGLOBAL.CO.UK).

Where we act only on a client's instructions in delivering an engagement, the client may instead be the data controller for that information. In those circumstances, the client's privacy information may also apply.

## 2. Information we use and where it comes from

Depending on your relationship with ESA, we may use:

- Business contact and enquiry details: name, organisation, job title, business email/telephone number, enquiries and correspondence.
- Client and project information: meeting records, work-related communications, delivery records and information relevant to services requested.
- Associate, contractor and supplier information: contact details, engagement agreements, qualifications or suitability information, account access/security records and payment details where relevant.
- Finance and agreement records: invoices, payment references, contract details, signatures and evidence of electronic signing.

We receive information directly from you, from the organisation you represent, from clients, referrals and professional contacts, and (where relevant) from publicly available business sources. We do not intentionally collect children's personal data as part of our business activities.

## 3. Why we use information and our lawful bases

We only use personal information where there is an appropriate legal reason. The applicable basis depends on the activity and the person concerned.

| Activity                | Why we use this information                                                                                | Lawful basis                                                                                                   |
|-------------------------|------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|
| Enquiries and proposals | Respond to enquiries, discuss requirements and provide proposals.                                          | Legitimate interests in handling business enquiries; steps before a contract where requested by an individual. |
| Client services         | Deliver consulting and exercising work; maintain relationships and project records.                        | Legitimate interests in delivering B2B services; contract where the individual is a contracting party.         |
| People and suppliers    | Manage associates, engagement terms, access, safeguarding business information and supplier relationships. | Contract where applicable; legitimate interests; legal obligations where relevant.                             |

|                       |                                                                                                         |                                                                                                          |
|-----------------------|---------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|
| Finance and contracts | Issue invoices, keep accounts, meet tax duties, obtain signatures and administer contracts.             | Legal obligation; contract where applicable; legitimate interests in managing and evidencing agreements. |
| Security and claims   | Control access, maintain security records, handle incidents, protect legal rights and resolve disputes. | Legitimate interests in securing the business and protecting rights; legal obligations where applicable. |

Where we rely on legitimate interests, these include running and securing a consultancy, communicating with business contacts and maintaining appropriate records. Where consent is the applicable basis, you may withdraw it at any time. Any electronic marketing is subject to the applicable marketing rules and your right to object.

## 4. Who may receive personal information

Access is limited to people who need the information for legitimate business purposes. This may include ESA's authorised leadership, employees or associates, relevant clients and contract parties, and professional advisers or public authorities where necessary.

We also use specialist service providers to operate our business, including Microsoft 365 for communications and documents, Xero for accounting and DocuSign for electronic agreements. Where approved AI-assisted tools are used, personal data should be minimised and used only in accordance with the approved business purpose and provider arrangements.

## 5. International use of information

ESA uses established cloud-based service providers, including Microsoft 365, Xero and DocuSign, to support its business operations. These services may involve personal information being stored, accessed or processed outside the United Kingdom.

ESA will only make international transfers of personal information where permitted under applicable UK data protection legislation. Where required, this includes reliance on UK adequacy regulations or recognised contractual safeguards, such as the UK International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses.

Individuals may contact ESA's Data Protection Lead using the contact details in Section 1 to request further information about relevant international transfers and the safeguards that apply.

## 6. How long we keep information

We keep personal information only as long as it is needed for the relevant activity, considering the type of record, legal/accounting obligations, client agreements, relevant limitation periods and legitimate business or security needs.

- Enquiries and prospect correspondence are reviewed when an enquiry is closed or a business relationship ends.
- Client, associate and contract records are retained during the relationship and for a justifiable period afterwards to meet contractual obligations and handle possible claims.
- Financial records are retained for the period required by applicable accounting and tax law; security records are kept for the period needed for audit and incident purposes.

When the retention reason ends, information is deleted, anonymised or otherwise disposed of securely. You can contact us to ask which retention period or criteria apply to particular information.

## 7. Your information rights

Depending on the circumstances and applicable law, you may have the right to access your personal information, correct it, ask for deletion, restrict its use, object to certain processing or receive a portable copy. You may withdraw consent where consent is used. These rights are not absolute.

You can make a request using the contact details in section 1. We may need to verify your identity before disclosing information. We will respond within the applicable legal timeframe. We do not use solely automated decision-making that produces legal or similarly significant effects in the activities described in this notice.

## 8. Questions and complaints

Please contact our Data Protection Lead using the details in section 1 if you are unhappy with how ESA has used your information. We will acknowledge a data-protection complaint within 30 days, investigate it as appropriate and tell you the outcome.

You may also complain to the UK Information Commissioner's Office (ICO) at <https://ico.org.uk/make-a-complaint/> . You do not need to wait for ESA to resolve the matter before contacting the ICO.

## 9. Changes to this notice

We review this notice at least annually and sooner if our services, processing, suppliers or legal obligations materially change. Where required, we will explain significant changes before using personal information for a new purpose. The version and date shown above identify the current approved notice once published.