

WISDOM DATA LIMITED

Privacy Policy

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1. Purpose

This Privacy Policy explains how **Wisdom Data Limited**, trading as **Wisdom** ("Wisdom", "we", "us", "our"), collects, uses, stores and protects Personal Data.

This Policy applies where:

- we provide services to you;
- you provide services to us;

- you subscribe to our communications; or
- you visit our website.

We are committed to protecting your privacy and complying with applicable data protection laws, including the UK GDPR and the Data Protection Act 2018.

This Privacy Policy applies to Website Users, Clients, Subscribers, Suppliers, business contacts, and emergency contacts provided by Staff. Staff should refer to the internal Data Protection Policy for employee-specific processing.

We may update this Privacy Policy from time to time. The latest version will always be available on our website.

If you wish to update your marketing preferences, please email support@wisdomdata.io.

2. Definitions

- **Clients:** Customers or organisations to whom Wisdom provides services.
- **Delete / Deletion:** Data is securely removed or put beyond operational use in line with retention requirements.
- **GDPR:** UK GDPR and, where applicable, EU GDPR.
- **Personal Data:** Any information relating to an identified or identifiable living individual.
- **Processing:** Any operation performed on Personal Data (e.g. collection, storage, use, disclosure, deletion).
- **Subscribers:** Individuals subscribed to our newsletters, events or marketing communications.
- **Staff:** Employees, contractors, interns and other workers engaged by Wisdom.
- **Suppliers:** Third parties providing services to Wisdom.
- **Website Users:** Individuals who access Wisdom websites.
- **Wisdom:** Wisdom Data Limited, registered in England and Wales.

3. What Personal Data do we collect?

Client Data

- Name
- Business email address
- Login credentials (via Auth0)

Survey Data

- Survey responses are anonymised and do not contain personally identifiable information.

Subscriber Data

- Name
- Contact details
- Marketing preferences

Supplier Data

- Business contact details
- Payment and banking details (where contractually required)

Referees and Emergency Contacts

- Name
- Contact details only

Website Usage Data

- IP address (where applicable)
- Device and browser information
- Website interaction data (via cookies)

Providing certain Personal Data is necessary for us to perform our contractual obligations. If you choose not to provide required data, we may be unable to provide services.

4. How do we collect your Personal Data?

- Directly from you (e.g. forms, emails, contracts)
 - Automatically via website cookies and analytics tools
 - From third parties where appropriate (e.g. marketing providers, referrers)
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5. How do we use your Personal Data?

We use Personal Data to:

- Provide and manage access to our services
- Communicate with Clients, Subscribers and Suppliers

- Send marketing communications (where permitted)
- Improve our website and services
- Comply with legal and regulatory obligations

Business communications may be reviewed where required for legal, compliance or security purposes.

6. Who do we share your Personal Data with?

We only share Personal Data where necessary and lawful.

Third-party service providers

We engage carefully selected third-party partners and service providers who process Personal Data on our behalf in compliance with GDPR. These include IT hosting, analytics, marketing, and professional advisers.

From time to time, we appoint digital marketing agencies to conduct outreach and marketing activities on our behalf. As part of these activities, Personal Data may be processed in accordance with applicable data protection laws.

Our appointed data processors include:

Prospect Global Ltd (trading as Sopro)

UK Company No: 09648733

ICO Registration: ZA346877

Privacy Policy: <https://sopro.io>

Data Protection Officer: dpo@sopro.io

We may also share data with:

- Professional advisers (legal, financial)
 - Regulators or authorities where required by law
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7. How do we safeguard your Personal Data?

We implement appropriate technical and organisational measures to protect Personal Data, including:

- Access controls and least-privilege access
- Encryption in transit and at rest

- Secure cloud infrastructure
 - Vendor due diligence and contractual safeguards
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8. How long do we keep your Personal Data?

We retain Personal Data only for as long as necessary for the purposes for which it was collected.

If there has been no meaningful contact for **three (3) years**, Personal Data is deleted unless retention is required by law.

9. How can you access, amend or withdraw your Personal Data?

You may contact us at **support@wisdomdata.io** to:

- request access to your data;
- correct or update information; or
- withdraw consent where applicable.

We respond without undue delay and within statutory timeframes.

10. Your Personal Data rights

You have the right to:

- Access your Personal Data
- Rectification
- Erasure
- Restrict processing
- Data portability
- Object to processing
- Withdraw consent

You may also lodge a complaint with the Information Commissioner's Office (ICO):

- Website: ico.org.uk

- Tel: 0303 123 1113
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11. International data transfers

Where Personal Data is transferred outside the UK or EEA, we ensure appropriate safeguards are in place, including Standard Contractual Clauses or adequacy decisions.

12. Responsibility for website processing

Wisdom is the data controller for Personal Data processed via its website.

13. Legal bases for processing (legitimate interests)

We process Personal Data under Article 6(1)(f) GDPR where necessary for legitimate business interests, including service improvement, communications, and business development, provided these do not override your rights.

14. Consent

Where consent is required, it is obtained through clear affirmative action. You may withdraw consent at any time by contacting support@wisdomdata.io.

15. Establishing, exercising or defending legal claims

We may process Personal Data where necessary for legal claims under Article 9(2)(f) GDPR.

16. Cookies

Cookies are small text files placed on your device. We use cookies to:

- operate our website;
- analyse traffic;
- improve user experience.

Our Cookie Notice is available on our website.

17. How to manage cookies

You can control cookies through your browser settings. Blocking cookies may affect website functionality.

For general information visit: <https://www.aboutcookies.org>

18. Contact details

Wisdom Data Limited

Email: support@wisdomdata.io

Website: <https://wisdomdata.io>