

# **Customer Privacy Notice**

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- How to complain

### Contact details

Email: hello@mohalagrowth.co.uk

## What information we collect, use, and why

We collect or use the following information to **provide and improve products** and services for clients:

- Names and contact details
- Addresses
- Pronoun preferences
- Occupation
- Usage data (including information about how you interact with and use our website, products and services)
- Records of meetings and decisions



We collect or use the following personal information for the **operation of client or customer accounts**:

- Names and contact details
- Addresses
- Purchase or service history
- Account information, including registration details
- Information used for security purposes
- Marketing preferences

We collect or use the following personal information for **information updates or marketing purposes**:

- Names and contact details
- Addresses
- Profile information
- Marketing preferences
- Purchase or account history
- Website and app user journey information
- IP addresses

We collect or use the following personal information for **research or archiving purposes**:

- Names and contact details
- Addresses
- Purchase or client account history
- Website and app user journey information
- IP addresses

We collect or use the following personal information to **comply with legal requirements**:

- Name
- Contact information
- Identification documents
- Client account information
- Any other personal information required to comply with legal obligations



## Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- Your right of access You have the right to ask us for copies of your
  personal information. You can request other information such as details
  about where we get personal information from and who we share personal
  information with. There are some exemptions which means you may not
  receive all the information you ask for. You can read more about this right
  here.
- Your right to rectification You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. <u>You can</u> <u>read more about this right here</u>.
- Your right to erasure You have the right to ask us to delete your personal information. You can read more about this right here.
- Your right to restriction of processing You have the right to ask us to limit how we can use your personal information. You can read more about this right here.
- Your right to object to processing You have the right to object to the processing of your personal data. <u>You can read more about this right here.</u>
- 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. You can read more about this right here.
- Your right to withdraw consent When we use consent as our lawful basis you have the right to withdraw your consent at any time. You can read more about this right here.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.



### Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide and improve products and services for clients** are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into
  or carry out a contract with you. All of your data protection rights may
  apply except the right to object.
- Legal obligation we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
  - o We process personal information based on our legitimate interests to effectively operate and grow our consultancy business, Mohala Growth Partners, while ensuring that we respect and protect the privacy rights of individuals. Providing and Improving Our Services Collecting personal information is essential for us to enter into and fulfil contracts with our clients. It allows us to communicate effectively, understand client needs, and deliver tailored consultancy services. By processing this data, we can offer personalised solutions, enhance client satisfaction, and improve our service offerings based on client feedback and interactions. We collect only the information necessary for these purposes.

Our lawful bases for collecting or using personal information for the **operation of client or customer accounts** are:



- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **information updates or marketing purposes** are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
  - Legitimate Interests We process personal information based on our legitimate interests to effectively operate and grow our consultancy business, Mohala Growth Partners, while ensuring that we respect and protect the privacy rights of individuals. We use personal contact information to inform clients and prospective clients about



our services, industry insights, events, and updates that may be of interest to them. This enables individuals to stay informed about opportunities that could benefit their businesses, such as new consultancy services, market trends, or best practices in growth strategies. We respect individuals' preferences and provide clear options to opt out of marketing communications at any time. We avoid excessive or intrusive messaging and do not share personal data with third parties for their own marketing purposes.

Our lawful bases for collecting or using personal information for **research or archiving purposes**:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into
  or carry out a contract with you. All of your data protection rights may
  apply except the right to object.
- Legal obligation we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
  - o We process personal information based on our legitimate interests to effectively operate and grow our consultancy business, Mohala Growth Partners, while ensuring that we respect and protect the privacy rights of individuals. Providing and Improving Our Services Collecting personal information is essential for us to enter into and fulfil contracts with our clients. It allows us to communicate effectively, understand client needs, and deliver tailored consultancy services. By processing this data, we can offer personalised solutions, enhance client satisfaction, and improve our



service offerings based on client feedback and interactions. We collect only the information necessary for these purposes.

Our lawful bases for collecting or using personal information to **comply with legal requirements**:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into
  or carry out a contract with you. All of your data protection rights may
  apply except the right to object.
- Legal obligation we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

## Where we get personal information from

- Directly from you
- Publicly available sources
- Market research organisations
- Providers of marketing lists and other personal information
- Suppliers and service providers
- Industry and networking events



## How long we keep information

#### **Client Contact Information**

Retention Period: Duration of the client relationship plus six years.

Reason: For ongoing service provision and to comply with legal obligations.

#### **Prospective Client Data**

Retention Period: Up to one year after the last interaction.

Reason: To follow up on potential business opportunities.

#### **Marketing Communications**

Retention Period: Until the individual unsubscribes or opts out.

Reason: Legitimate interest in promoting services.

#### Financial Records

Retention Period: Minimum of six years.

Reason: Compliance with tax and accounting regulations.

#### **Email Correspondence**

Retention Period: Varies, but often between one to three years.

Reason: For reference and to address any follow-up issues.

#### **Website Analytics Data**

Retention Period: 26 months or less.

Reason: To analyze website performance and user engagement trends.



### Who we share information with

Others we share personal information with

- Other financial or fraud investigation authorities
- Professional or legal advisors
- Organisations we're legally obliged to share personal information with
- Professional consultants

## How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Website: <a href="https://www.ico.org.uk/make-a-complaint">https://www.ico.org.uk/make-a-complaint</a>

## Last updated

21 October 2024