



FLEETWOOD
STRATEGY

COMPANY POLICY

PRIVACY NOTICE

Introduction

Welcome to our privacy notice. We respect your privacy and are committed to protecting your personal data. You might be someone who:

- Visits our website.
- Contacts us to buy, or to explore buying, our products and services.
- Is applying to come and work with us.
- Uses our products and services.
- Works for one of our suppliers, or prospective suppliers, who we buy, or may buy, products and services from.
- Is a public official, journalist or member of a third party charity or organisation involved in policy and / or advocacy, whose data we may collect, use and share for the purposes of supplying our products and services.
- Participates in opinion research that we carry out for our clients.

Whoever you are, this privacy notice tells you about how we collect, use and look after your personal data. It also tells you about your privacy rights and how the law protects you.

Our website, products and services are not intended for children, and we do not knowingly collect data relating to individuals under 18 years old.

We keep this privacy notice under regular review. This version was last updated on 9 December 2025. Historic versions can be obtained by contacting us.

You can easily navigate your way through this privacy notice using the following links:

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Important information and who we are

Controller

Fleetwood Strategy Limited (company number 12427753) is the so-called controller of your personal data and is therefore responsible for it by law (referred to as "we", "us" or "our" in this privacy notice).

Contact details

If you have any questions about this privacy notice or our privacy practices, or if you wish to exercise your privacy rights, please contact us in the following ways:

Email address: contact@fleetwoodstrategy.com

Postal address: 120 Regent Street, London W1B 5FE

You have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please do contact us in the first instance so that we can help to address your concerns.

Your duty to tell us about any changes

It is important that the personal data which we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our website may include links to third-party websites, plug-ins and applications.

Clicking on those links may allow third parties to collect or share data about you. We do not control these third-party websites, plug-ins or applications and are not responsible for their privacy notices. When you leave our platform or website, we encourage you to read the privacy notice of every website you visit.

The personal data we collect about you

Personal data, or personal information, means any data / information about an individual that directly or indirectly identifies them. It does not include data / information where the identity has been removed (i.e. anonymous data).

We may collect, use, store and transfer distinct kinds of personal data about you which we have grouped together as follows:

- **Identity data** - first name, maiden name, last name, previous names, username or similar identifier, marital status, title, date of birth and gender.
- **Contact data** - addresses, email addresses and telephone numbers.
- **Transaction data** - details about payments to and from you and other details of products and services that you have purchased from us or we have purchased from you.
- **Technical data** - internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access our website.

- **Profile data** - your username and password, purchases, bookings or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage data** - information about how you use our website and other products and services.
- **Marketing and communications data** - your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Visual and audio data** - photos, recordings and videos of your participation in focus groups we run as part of opinion research that we carry out for our clients.
- **Recruitment data** - copies of right-to-work documentation, references, results of any background checks and other information included in a CV or cover letter or as part of the application process.

We may also collect **special category personal data** about you:

- If you are a public official, journalist or a member of a charity or organisation involved in policy and / or advocacy, we may also collect information about your political opinions and / or philosophical beliefs.
- If you are a participant, or prospective participant, in one of our focus groups, we may collect information about your political opinions and / or philosophical beliefs.
- If you are a candidate applying to come and work with us, we may also collect information about criminal convictions and offences as part of our background checks, including the outcome of any Disclosure and Barring Service ('DBS') checks.

Additional protections apply to this data under the law.

Other than the above, we do not collect any special categories of personal data about you (including details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data), nor do we collect any information about criminal convictions and offences.

We also collect, use and share **aggregated data** such as statistical or demographic data. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not, directly or indirectly, reveal your identity.

For example, we may aggregate your usage data to calculate the percentage of users accessing our website or using our products and services. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

If you fail to provide personal data

If we need to collect personal data to fulfil a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract that we have or are trying to agree with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

How we collect your personal data

We use different methods to collect personal data from and about you including through:

- **Direct interactions.** You may give us certain personal data, such as your identity data and contact data, through your direct interactions with us. This includes personal data you provide when you:
 - Visit our website.
 - Contact us to buy, or to explore buying, our products and services.
 - Use our products and services.
 - Request marketing to be sent to you.
 - Work for one of our suppliers, or prospective suppliers, who we buy, or may buy, products and services from.
 - Are applying to come and work with us.
 - Attend events that we run or are otherwise networking with us,
 - Participate in opinion research that we carry out for our clients.
 - Enter a survey.
 - Give us feedback or otherwise contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies. Please see our cookies policy for further details.
- **Third parties or publicly available sources.** We will collect or receive personal data about you from various third parties and publicly available sources as set out below:
 - Identity and contact data from social media platforms such as LinkedIn, or gathered from attending networking events.
 - Technical data from analytics providers such as Google.
 - Identity and contact data from intelligence software, such as GovConnex (particularly, if you are a public official).
 - Identity and contact data from publicly available sources, such as Companies House, the electoral register and, if you are a public official, the Civil Service Yearbook.
 - Contact, financial and transaction data from providers of technical, payment and delivery services (if applicable).
 - Identity and contact data from opinion research recruiters, such as iPoint, who help us to find people who want to participate in focus groups that we run as part of opinion research which we carry out for our clients.
 - Identity, contract and recruitment data from third-party recruitment agencies and background check service-providers that we use to help find and qualify candidates for roles which we have vacant.

How we use your personal data

We will only use your personal data when the law allows us.

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to carry out the contract that we are about to enter into, or have entered into, with you, or where we need to otherwise provide you with a service or product that you have requested, or to employ you. This base may include where we need to take certain steps, at your request, before we enter into a contract.

- **Legitimate interests:** Where it is necessary to conduct our business and pursue our legitimate interests, which is generally where we use your personal data in ways you would reasonably expect us to. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). Examples of where using your personal data would be in our legitimate interests include:
 - Defining types of clients for our products and services.
 - Developing our products and services, growing our business and informing our marketing strategy.
 - Keeping our records updated, managing our relationship with you, and studying how clients use our products / services.
 - Recruiting and considering candidates to fill vacant positions.
 - Administering and protecting our business, and our products and services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).
- **Legal obligation:** Where it is necessary for compliance with a legal obligation to which we are subject. We will identify the relevant legal obligation when we rely on this legal basis. For example, keeping recordings and providing information to tax authorities or carrying out right-to-work checks before making offers of employment.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example, if you subscribe to an email newsletter.

Purposes for which we will use your personal data

We have set out below a description of all the ways that we use your personal data, and which of the legal bases we rely on to do so. We have also identified our legitimate interests, where appropriate.

Please note that we may process your personal data on more than one lawful basis depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific lawful basis we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose / Activity	Type of data	Lawful basis for processing (including basis of legitimate interest, where relevant)
To register new clients or suppliers	(a) Identity (b) Contact	(a) Performance of a contract with you
To provide our products and services to clients / To receive products and services from our suppliers	(a) Identity (b) Contact (c) Special category (we may collect and use information about the political opinions and / or philosophical beliefs of certain public officials, journalists or members of a charity or organisation involved in policy and / or advocacy)	(a) Performance of a contract with you (b) Necessary for our clients' legitimate interests (to connect with elected representatives, journalists and policy experts on topics that are important to them) (c) Necessary to perform a task carried out in the public interest (d) Consent, where provided for the processing of special category data
To run focus groups as part of carrying out opinion research activities related to the provision of products and services to our clients	(a) Identity (b) Contact (c) Visual and audio data (d) Special category (we may collect and use information about the political	(a) Necessary for our clients' legitimate interests (to perform opinion research on their behalf) (b) Consent, where data subjects have provided consent to our processing of

	opinions and / or philosophical beliefs of participants, and prospective participants, in our focus groups)	their data (including for the processing of special category data)
To manage our accounts with clients, including to: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy notice (b) Asking you to leave a review or take a survey (c) Dealing with your requests, complaints and queries	(a) Identity (b) Contact (c) Profile (d) Marketing and communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated, to manage our relationship with you and to study how clients use our products / services)
To enable you to complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how clients use our products and services, to develop them and grow our business)
To run a recruitment process for a role that you are considering or to which you have applied, to make a decision as to whom to recruit and to comply with our legal obligations in connection with such recruitment e.g. right-to-work checks	(a) Identity (b) Contact (c) Recruitment	(a) Performance of a contract with you (taking steps prior to entering into a contract) (b) Necessary for our legitimate interests (for running our business, to consider and recruit candidates to fill vacant positions) (c) Necessary to comply with a legal obligation
To administer and protect our business, our website and our products and services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver content to you, via our website, and to measure or understand the effectiveness of the content we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and communications (f) Technical	(a) Necessary for our legitimate interests (to study how clients use our products and services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website and our products and services, marketing, customer relationships and experiences and to measure the effectiveness of our communications and marketing	(a) Technical (b) Usage	(a) Necessary for our legitimate interests (to define types of clients for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To send you relevant marketing communications and make personalised suggestions and recommendations to you about products or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and communications	(a) Necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business) (b) Consent, where you have provided your consent to receiving direct marketing communications

Direct marketing

By subscribing to the “stay informed” feature on our website, you are agreeing to receive direct marketing communications from us via email. Otherwise, we do not use your personal data for direct marketing.

We may also use your identity, contact, technical, usage and profile data to form a view on what we think you may want or need, or what may be of interest to you. Doing so is how we decide which products, services and offers may be relevant for you.

Third-party marketing

Please rest assured that we will get your express opt-in consent before we share your personal data with any third party for their own direct marketing purposes.

Opting out of direct marketing

You can ask us , or third parties acting on our behalf, to stop sending you direct marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at contact@fleetwoodstrategy.com.

Where you opt out of receiving these direct marketing messages, you will still receive service-related communications that are essential for administrative or customer service purposes, for example, relating to products and services that you have purchased, appointment reminders, updates to our terms and conditions, and checking that your contact details are correct.

Our opinion research activities

Our opinion research activities involve either (a) conducting polls or surveys or (b) running in-person or online focus groups, in each case in accordance with our particular client’s brief.

Polls and surveys

We use specialist third party suppliers to host polls and surveys and to share these polls and surveys with people who they select from their database according to the criteria that we set on behalf of our clients.

We only receive the anonymised results of the polls and surveys, and only process anonymised personal data belonging to the participants in the polls and surveys.

You should refer to the relevant third party supplier’s privacy notice for more details on how they handle your personal data.

Focus groups

We also use specialist third party suppliers to provide participants for, and to facilitate, the focus groups which we run on behalf of clients. These suppliers select prospective participants from their database according to the criteria that we set on behalf of our clients.

The third party suppliers provide us with a list of prospective participants in the focus group, which includes their identity and contact data and possibly information about their political opinions and / or philosophical beliefs (a category of special category data – see above).

Then, they help us to coordinate and schedule the focus group. Video or audio recordings of the sessions may be taken. Our client for whom we are running the focus group may also observe the focus group.

We ask our third party suppliers to share this privacy notice with you before they share any personal data about you with us. Please tell the supplier immediately if you do not wish for your personal data to be shared with us.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies.

If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

For more information about the cookies we use, please see our cookies policy.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Sharing your data with third parties

Do you share my personal data with third parties?

We may share your personal data with the parties set out below for the purposes set out in the table above.

- Other companies within the same group of companies as us.
- Our clients or prospective clients.
- Third parties which we use to help deliver our products and services.
- Other third parties which we use to help run our business, such as marketing agencies, website hosts, website analytics providers and IT and system administration services.
- Our bank(s).

We only allow those organisations to handle your personal data if we are satisfied that they take appropriate measures to protect your personal data. We also impose contractual obligations on them to ensure they can only use your personal data to provide services to us and to you.

We or the third parties mentioned above occasionally also share personal data with:

- Our, and their, external auditors, e.g. in relation to the audit of our, or their, accounts, in which case the recipient of the information will be bound by confidentiality obligations.
- Our and their professional advisers (such as lawyers and other advisers), in which case the recipient of the information will be bound by confidentiality obligations.

- Law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations.
- Other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency - usually, information will be anonymised, but such may not always be possible. The recipient of any of your personal data will be bound by confidentiality obligations.

If you are a public official, journalist or member of a third party charity or organisation involved in policy and / or advocacy, we may also share your identity and contact data (and information about your political opinions and / or philosophical beliefs) with our clients as part of providing our products and services to them.

If you would like more information about who we share our data with and why, please contact us.

Transferring your data internationally

Do you transfer my personal data outside of the UK?

Countries outside the UK have differing data protection laws, some of which may provide lower levels of protection of privacy.

It is sometimes necessary for us to transfer your personal data to countries outside the UK and, in those cases, we will comply with applicable UK laws designed to ensure the privacy of your personal data.

For example, your personal data may be transferred outside of the UK where we use suppliers located, or which hold data in servers, outside the UK.

Where we transfer your data outside of the UK, we always comply with UK data protection laws, which only allow us to transfer your personal data to a country outside the UK where:

- The UK government has decided the particular country ensures an adequate level of protection of personal data (known as an “adequacy regulation”) further to Article 45 of the UK GDPR. A list of countries the UK currently has adequacy regulations in relation to is available [here](#).
- There are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you. These safeguards / rights / remedies are achieved by using specified standard contractual terms approved by the UK government and which give the transferred personal data the same protection as it has in the UK.
- A specific exception applies under relevant data protection law.

If you would like further information about data transferred outside the UK, please contact us.

Looking after your data

How do you protect my personal data?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, or used, accessed, altered or disclosed in an unauthorised way.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place policies and procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Keeping your data

For how long will you use my personal data?

We will only keep your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

We may keep your personal data for a longer period in the event of a complaint or if we reasonably believe that there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for your personal data are available upon request.

In some circumstances, you can ask us to delete your data: see below for further information.

In some circumstances, we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your legal rights

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- **Right to request access** to your personal data (commonly known as a “data subject access request”). This right enables you to receive a copy of the personal data that we hold about you and to check that we are lawfully processing it.
- **Right to request correction** of the personal data that we hold about you. This right enables you to have any incomplete or inaccurate data that we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Right to request erasure** of your personal data. This right enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully, or where we are required to erase your personal data to comply with the law. Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Right to object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Right to request restriction of processing** of your personal data. This right enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful, but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

- **Right to request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party which you have chosen, your personal data in a structured, commonly-used and machine-readable format. Please note that this right only applies to personal information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- **Right to withdraw consent at any time** where we are relying on consent to process your personal data. However, this right will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if such is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This request is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally, it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.