# **Privacy Policy of Push Pull Digital Consultancy Limited (July 2025 Edition)**

Thanks for taking the time to read our Privacy Policy. This policy (together with our website terms of use) explains how, why and what personal data we collect about you, as well as information about how we will handle (process) that personal data. Please read through this document carefully, and do contact us if you have any questions about this policy. By visiting our website (https://pushpull.digital/) you are accepting and consenting to the practices described in this policy.

### 1. About us

We, (referred to as "we", "us" or "our" in this policy) Push Pull Digital Consultancy Limited, company registration number 14686768 of 55 The Turnways, Leeds, LS6 3DT are the Controller of the personal data collected about you (as that term is defined in data protection law).

## 2. What information do we collect from you?

We may process the following data about you:

# 2.1 Information you give us

What personal data might you supply to us?	How and why we process your personal data
Communication Data: If you communicate with us, we may process the information contained in your communication. This information may include your name and contact information, the content of your communication and any data our website automatically generates when you communicate with us using the contact form available on our website.	We will process that information so we can correspond with you and keep records of such correspondence. The reason we are processing this data is to ensure the proper administration of our business (our legitimate interest).
Notification Data: Where you have purchased products/services from us, or where you subscribe to receive emails from us about our business, we will process your data so that we can send such emails to you. If you prefer not to receive such communications you can change your preferences in your settings, or unsubscribe from our communications at any time. You can also contact us using the information in paragraph 9 below to unsubscribe.	The legal basis for us processing this data is that you have consented to such processing either expressly or as a result of you purchasing products/services from us.

Regulatory Data: We may process your personal data if we need to do so in order to comply with our legal and/or regulatory obligations, so that we can protect the vital interests of you or another person. For example, if you are visiting our premises and you have a medical condition which means we have to put additional measures in place to keep you safe, we may keep a record about that to ensure we can always keep you safe if you want to visit us again in the future.

The reason we will process such data is to protect the vital interests of you or another person.

# 2.2 Other information we collect about you

We automatically collect technical information about your visits to our website. This is information such as:

- (a) technical information, including the internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. This is known as analytical data;
- (b) other information about your visit(s) to our website such as the pages you viewed, searches you have made and how you have interacted with our website.

We process this data so we can monitor and analyse how our website is used so we can improve our website and our services.

### 2.3 Information we receive from other sources

This is information we receive about you if you use any of the other websites we operate or the other service we provide. We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, and credit reference agencies). We may receive personal data about you from these organisations. These organisations will have their own privacy policies detailing how they process personal data.

### 3. Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy . You can change your cookie preferences using the settings on your device.

### 4. When will we disclose your personal data to others?

4.1 We may need to share your personal data with members of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries. These terms are defined in section 1159 of the UK Companies Act 2006. We will only share such personal information where this is necessary for the purposes set out in this policy.

- 4.2 We may need to share your personal information with certain selected third parties including:
  - (a) our business partners, suppliers and subcontractors for the purpose of performing any contract we have with you or them;
- 4.3 We will also disclose your personal information to third parties in the following circumstances:
  - (a) if we sell or buy any business or assets, in which case we may need to disclose certain personal data to the prospective seller or buyer of such business or assets.
  - (b) if all or most of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.
  - (c) if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce any legal arrangement we have with you; or to protect our rights or property, or the safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

### 5. Where do we store your personal data?

We will always try to ensure that your personal data is processed within the UK and/or European Economic Area ("EEA"). In some circumstances this will not be possible. In circumstances where it is necessary for us to transfer your personal data outside the UK and/or EEA, we will only transfer such personal data to third parties where we have checked such third parties to ensure they will protect your personal data in a similar way to us, with appropriate standards and safeguards. We will also have contractual provisions in place with such third parties to ensure that your personal data will be protected in the same way as it is in the UK and that the rights you have in respect of your personal data are respected. You consent to the transfer of your personal data outside of the UK and/or EEA, as long as we comply with these requirements.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, and we will maintain appropriate technical and organisation measures to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### 6. How long will we keep your personal data and when will it be deleted?

(a) We will keep your personal data information until we have completed the purpose(s) for which we collected it. After this time, it will be deleted unless there are legal or regulatory reasons we need to retain it. If this is the case we will delete the personal data which is no longer needed, and when the regulatory or legal reason no longer applies, we will delete the remaining personal data. In some cases, the purpose for which we are processing your

personal data will last for a considerable period (for example, if you are a long term customer of ours, we will need to store our data until our relationship with you comes to an end). In other cases, you might not interact with us for a long period, but then renew your relationship with us. In this case, we will resume collection of your personal data as set out in this policy.

- (b) We will consider a number of factors when we decide how long we will store your personal data. This includes the type of personal data we hold about you, if that personal data is sensitive in nature, whether you might be harmed if that personal data was disclosed without authority and other legal factors. We will also consider how you engage with us and what contracts we have in place with you.
- (c) We may need to retain your personal data where this is necessary to comply with our legal or regulatory obligations, or to protect your vital interest or the vital interests of another person.

# 7. Data security

We implement various measures to keep your personal data safe and keep it secure. This includes ensuring that only those people who need to access your personal data can see it. We will make sure the people who can access your personal data receive training so they understand their responsibilities to keep your personal data safe and secure, and to ensure they understand and respect your rights under data protection laws. We will also make sure they keep your personal data confidential.

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

## 8. Your rights

- 8.1 Under data protection laws you have the following rights:
  - (a) The right to access the personal data we hold about you. For more information how you can do this, please see paragraph 8.2 below;
  - (b) The right to have your personal data corrected if there are errors or inaccuracies in it, or your personal data is incomplete;
  - (c) The right to restrict the processing we carry out in relation to your personal data;
  - (d) The right to object to the processing we carry out in relation to your personal data;
  - (e) The right to have the personal data we hold about you provided to you in a usable format (which means a format that is easy to read and understand);
  - (f) The right to complain to a supervisory authority (in the UK this is the Information Commissioner's Office) about how and/or why we are processing your personal data;
  - (g) The right to tell us you no longer consent to us processing your personal data. In practice you will usually agree in advance to us using your personal data for marketing purposes and if you no longer wish us to use your personal data for marketing purposes, you can opt out of receiving such marketing messages at any time. You can do this either by unsubscribing from the marketing messages we send you or by notifying us in writing using the email address

below (in paragraph 10).

- 8.2 You can ask us to provide you with details of any personal data we hold about you. You do not have to pay us a fee to access your personal data unless you have made repeated requests leading us to believe (reasonably) that the intention of your request is unfounded and/or its purpose is to significantly frustrate the operation of our business. In this situation, we may charge you a reasonable fee to access your personal data or we may decide not to comply with your request. We will tell you if this is the case. We will ask you to provide appropriate evidence of your identity before we respond to your request, to ensure we are providing information relating to you (and not someone else). Typically, this identification evidence will be a photocopy of your passport or photo driving licence, which a solicitor or bank has certified as being a true copy of the original and a copy of a recent utility bill detailing your current address.
- 8.3 Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, these websites have their own privacy policies and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

# 9. Changes to our privacy policy

Any changes we make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

## 10. How to get in touch

## **Push Pull Digital Consultancy Limited**

**Data Protection Team** 

55 The Turnways, Leeds, LS6 3DT

hello@pushpull.digital