

# Privacy Statement



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# Introduction

Bullwip (referred to in this document as, “we”, “our”, “us”), take your privacy and the security of your personal data very seriously and want to be as clear and transparent as possible about what we do with it.

This is in line with our core company values where we place the customer at the heart of our focus. Together we will be reliable and responsive in the way we deal with people, and we will also treat everyone with trust and respect.

This privacy statement explains how we process your personal data. (“processing” means everything we do with your data including when we collect, record, organise, structure, store, use, disclose, disseminate, restrict, erase or destroy data about you). It also explains when we might disclose your data to others, how we keep it secure and also your rights regarding your data.

To fulfil our responsibilities and demonstrate compliance with the General Data Protection Regulation (EU) 2016/679 (GDPR), The UK GDPR & The Data Protection Act 2018, we are committed to the six principles of the regulations by (1) Processing your personal data lawfully, fairly and in a transparent manner (2) Collecting your personal data for specified explicit and legitimate purposes (3) Ensuring that your personal data is adequate, relevant and limited to what is necessary (4) Ensuring that your personal data is accurate and, where necessary, kept up to date (5) Retaining your personal data only for as long as necessary (6) Processing your personal data in an appropriate manner to maintain security.



# Information About Us

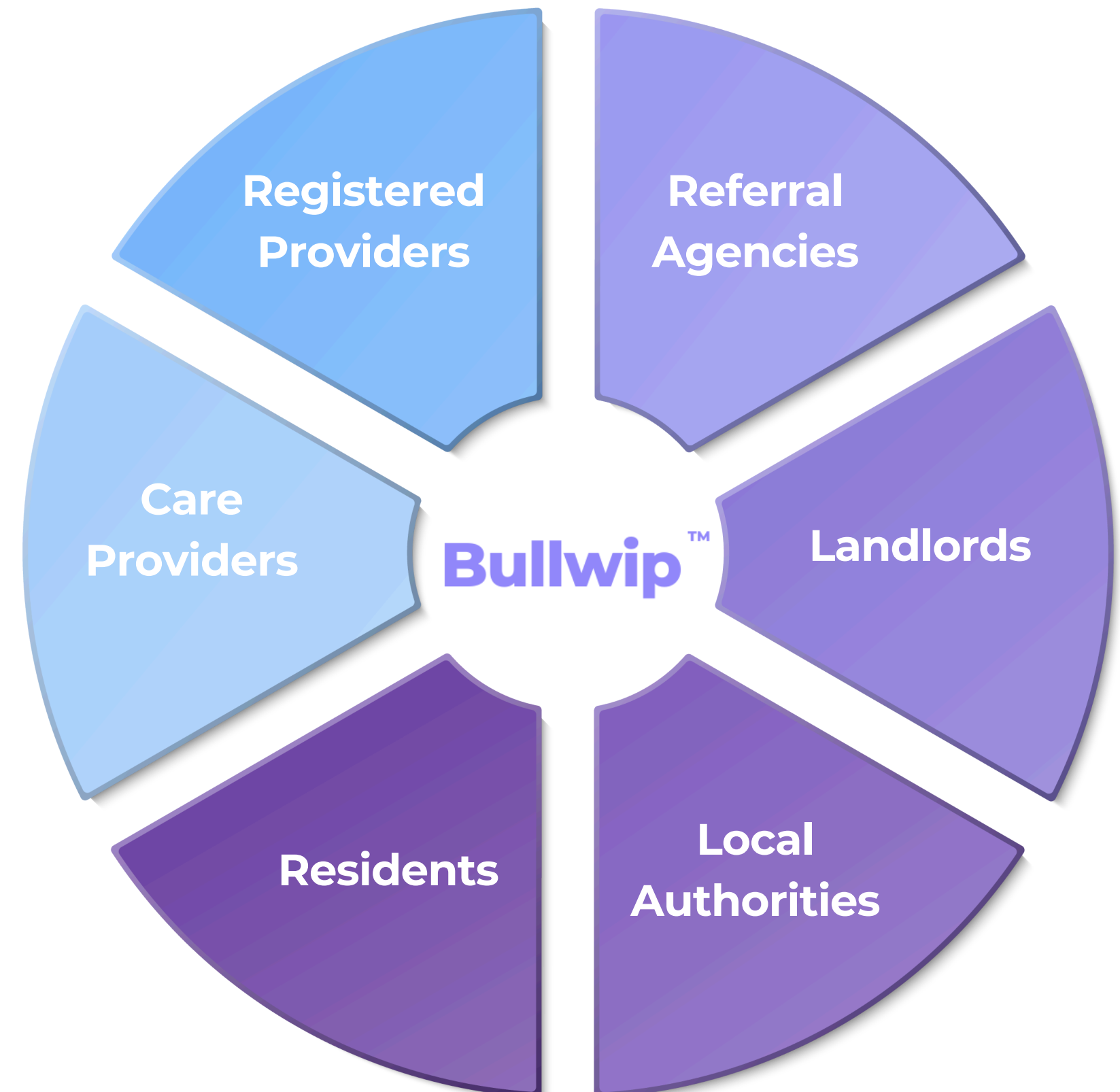
Bullwip is a registered trademark of Malvern Analytics Ltd. The data controller is Malvern Analytics Ltd, Kingsway House, 40 Foregate Street, Worcester, United Kingdom, WR1 1EE. We are registered in England & Wales company number 16188074.

The purpose of Malvern Analytics is to provide Technology and Digital Transformation Solutions to customers based in the UK.



# When do we collect your personal data

- During account registration
- When subscribing or purchasing services
- During onboarding or implementation
- During training sessions
- While using the platform or services
- When users provide data on behalf of others
- Through communication channels
- During system monitoring and security
- Through automated data collection mechanisms
- When handling legal or compliance requests
- When accessing support services
- During marketing activities
- When conducting surveys or feedback collection



# What information do we collect from you

## GENERAL PERSONAL DATA

### Basic Identifying Information

- Full name
- Date of birth
- Gender
- Contact information (phone number, email address)
- Address history
- National Insurance or Social Security number
- Identification documents (passport, driving license, etc.)

### Housing Details

- Tenancy agreement information
- Previous housing history
- Current living arrangements
- Rent payment details
- Utility account details

### Financial Information

- Bank account details
- Income details (salary, benefits, pensions)
- Employment status
- Debt or arrears information

### Family and Relationships

- Emergency contact information
- Next of kin details
- Dependents



## **SENSITIVE PERSONAL DATA (SPECIAL CATEGORY DATA)**

### **Health Information**

- Physical health conditions
- Mental health conditions
- Disabilities and accessibility requirements
- Medical history and prescriptions
- Care plans or support needs

### **Racial or Ethnic Origin**

- Ethnicity
- Language preferences

### **Religious or Philosophical Beliefs**

- Religion (if relevant to accommodations or services)

### **Biometric Data**

- Fingerprints or facial recognition (for access to secure areas, if applicable)

### **Sexual Orientation**

- Information about sexual orientation (only if directly relevant to care or support needs)

### **Criminal Record Information**

- Past convictions (where necessary for safeguarding)
- DBS (Disclosure and Barring Service) checks

### **Substance Use History**

- Drug or alcohol dependency history
- Rehabilitation program details

### **Domestic Violence or Safeguarding Concerns**

- History of abuse or violence
- Risk assessments



# Why do we collect this information

We process your personal information for the following reasons:

## **Pursuant to a contract in order to:**

Process information at your request to take steps to enter into a contract, provide you with our products and services , process payments , maintain business and service continuity.

## **On the basis of your consent:**

Where we rely on your consent for processing this will be requested when the information is collected from you. You have the right to withdraw consent at any time. See the 'What are your rights' section for more information.



**In our legitimate interests of providing the best service and improving and growing our business we will process information in order to:**

Provide you with a personalised service, provide you with specific marketing offers and services relating to a product, improve our products and services , keep our platform and systems safe and secure, understand our customer base and trends , defend against or exercise legal claims and investigate complaints, understand the effectiveness of our marketing, carry out analytics to improve our products and services.

You have the right to object to processing carried out for our legitimate interests. See the 'What are your rights' section for more information.

**To comply with legal requirements relating to:**

The provision of products and services, data protection, health and safety, anti-bribery and corruption, fraud investigations, assisting law enforcement, any other legal obligations placed on us from time to time by regulatory bodies.





# How long do we keep your information

As a general principle we will hold your personal data only for as long as necessary in order to fulfil the purposes for which it was collected. Once these purposes have been achieved we will erase the data or anonymise it in such a way as to make it impossible to identify you, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

If your data relates to a financial transaction we will keep information about you for a maximum of 6 years after the end of our relationship with you (unless obligations to our regulators require otherwise or we are required to remove such data from our records). This is to enable us to comply with our legal obligations regarding record-keeping for tax and accounting purposes.

For more details on record retention please contact us via [info@bullwip.co.uk](mailto:info@bullwip.co.uk)



# Who might we share your information with

For the purposes set out in the 'Why do we collect this information' section above, we will share your personal information with:

- third parties, some of whom we appoint to provide services, including: cloud service providers for the performance of any contract we enter into with you, IT Security specialists.
- analytics and search engine providers that assist us in the improvement and optimisation of our site
- regulatory bodies
- 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 or apply our terms of use and other agreements; or to protect the rights, property, or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of safeguarding.



When disclosing your data to third parties we have an obligation to ensure that we have appropriate measures in place to ensure your data is protected. We will therefore do the following:

- take steps to ensure the reliability of third parties with whom we share your personal data.
- take measures to ensure that third parties who we authorise to process your data observe confidentiality, process data only based on documented instructions from us, take appropriate security measures and delete or return all personal data at the end of the service.
- take steps to ensure only the data which is absolutely necessary for them to perform their processing is disclosed to third parties.
- take steps to ensure that your data is not made accessible to an indefinite number of persons.
- minimise the amount of personal data we disclose.
- ensure Pseudonymisation of your personal data, where possible (“Pseudonymisation” means disguising or masking your data so that it cannot be read without additional information which we keep separately in a secure environment).



# Confidentiality and security of your personal data

We are committed to protecting your personal and financial information. All information kept by us is stored on our secure servers. Where we have given you (or where you have chosen) a password that enables you to access certain parts of our service, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. We are committed to regularly testing, assessing and evaluating the effectiveness of our technical and organisational measures to manage the security of your personal data.

Our Governance Framework is the system by which our organisation is directed and controlled and provides the rules and the structures to manage this. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. More information is available by contacting us. We secure access to all transactional areas of our websites and apps using 'https' technology. Access to your personal data is password-protected, and sensitive data (such as payment card information) is secured by SSL encryption.



# What are your rights

Where processing of your personal data is based on consent, you can withdraw that consent at any time. You can exercise your rights at any time by contacting us. Our contact details are given below.

You have the right:

- to ask us not to process your personal data for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes
- to ask us not to process your personal data where it is processed on the basis of legitimate interests provided that there are no compelling reasons for that processing
- to ask us not to process your personal data for scientific or historical research purposes, where relevant, unless the processing is necessary in the public interest
- to request from us access to personal information held about you
- to ask for the information we hold about you to be rectified if it is inaccurate or incomplete



- to ask for data to be erased provided that the personal data is no longer necessary for the purposes for which it was collected, you withdraw consent (if the legal basis for processing is consent), you exercise your right to object, set out below, and there are no overriding legitimate grounds for processing, the data is unlawfully processed. The data needs to be erased to comply with a legal obligation or the data is children's data and was collected in relation to an offer of information society services
- to ask for the processing of that information to be restricted if the accuracy of that data is contested, the processing is unlawful, the personal data is no longer necessary for the purposes for which it was collected, or you exercise your right to object (pending verification of whether there are legitimate grounds for processing)
- to ask for data portability if the processing is carried out by automated means and the legal basis for processing is consent or contract

Should you have any issues, concerns or problems in relation to your data, or wish to notify us of data, which is inaccurate, please let us know by contacting us using our contact details below. In the event that you are not satisfied with our processing of your personal data, you have the right to lodge a complaint with the relevant supervisory authority, which is the Information Commissioner's Office (ICO) in the UK, at any time. The ICO's contact details are available here: <https://ico.org.uk/concerns/> . You can also call them on 0303 123 1113.



# Contact details of our Privacy Compliance Manager

Our Privacy Compliance Manager is here to help. If you have any questions or concerns relating to the handling of your personal data, queries related to subject access requests, third parties whom we share your data with, your rights or want to make a complaint about how we are processing your data, you can get in touch.

Privacy Compliance Manager

Malvern Analytics Ltd

Kingsway House, 40 Foregate Street, Worcester, United Kingdom, WR1 1EE.

Alternatively you can email us directly at [info@bullwip.co.uk](mailto:info@bullwip.co.uk)



**Bullwip**™