

# Build Concierge Privacy Notice

## Introduction

Build Concierge is committed to protecting your privacy and this Privacy Policy explains how we process your personal information, either when you visit our website or are a recipient of our services, in compliance with data protection regulations.

If you are an employee of Build Concierge we have a separate policy that covers the processing of your personal data.

## Who we are

Founded in 2024, Build Concierge provides a secure, cloud-based AI-powered customer engagement platform that integrates with multiple communication channels to automate, manage, and scale client operations in real time.

Our company number is 14992309, and our registered office address is Parkhill Studio Walton Road, Parkhill Studio, Wetherby, United Kingdom, LS22 5DZH. We are registered with the ICO as a data controller, registration number ZB730603.

## Why do we process personal data

- To provide our clients with an integrated customer engagement platform, we will process data provided by our Clients. In this capacity, we are a Data Processor. This data is provided directly by our clients. Contracts with Build Concierge constitute written instructions to process the data that you send to us or arrange for others to send to us.
- We are the Data Controller for Build Concierge's employees, prospective employees, customers (for the purposes of contract administration only), and suppliers with whom we intend, have or had obligations under contract
- We are a Data Controller for the investors of Build Concierge
- We maintain a marketing database of prospective and current customer data where consent has been given and not withdrawn or expired, or where we have reason to believe there is legitimate business interest in us keeping you informed of our company, products and services. This information can be collected directly from our website when a customer signs up to hear more about our products and services, or

from other publicly available sources such as LinkedIn, or other company websites.

If you do not have a direct contract with Build Concierge, and you do have a direct relationship with one of our business customers (eg. as an employee of the business customer, or as a customer of that business), then you should review their data privacy information and contact them in the first instance; it is likely that they are the Data Controller and will be best placed to help you.

## **The type of personal information we collect**

We process two types of data for our customers:

- Data that they provide to us about their customers, enabling them to deliver products and services to their customers.
- Data that is required for us to deliver our contract to them, for example, contact information of their employees.

Where we are processing personal data to fulfil our legal obligations to our business clients, the data that we process and store on their behalf is determined by them. Typically our business clients process the following types of information:

- Identity Data: your first and last names
- Contact Data: business email address, business contact number (where available)
- Address Data: Customers delivery address

To deliver our contract to our clients, we will process information for business administration purposes e.g. establishing a contract, invoicing etc.

Where we are required to collect your personal data by law (such as our obligations in carrying out fraud and money laundering checks) or under the terms of a contract we have with you and you fail to provide that data when requested, then we may not be able to perform the contract we have or are you trying to enter into with you (for example to provide you with our 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.

Like many organisations, we utilise technology to deliver great service to our customers, in a way that is timelier and more accessible than if we had to visit everyone in person. eg. through products such as Zoom or Microsoft Team. In some instances, we will record telephone conversations and web-based meetings (s) for quality and training purposes. If you would prefer this information not to be collated, please inform your host at the beginning of any call.

### **Special Categories of Personal Data**

We do not routinely collect special category data.

### **How we get the personal data and why we have it**

We'll collect and process your data for different reasons in different circumstances, but we'll only collect and process your data where we have a legal basis for doing so. Our purpose and legal basis for processing is set out below.

Personal data may be provided to us by you directly, or provided to us from other sources where information needs to be shared, for example where other parties are involved in the services being delivered to you such as financial advisors or legal representatives. Other examples include professional bodies, financial bodies, and suppliers or contractors. We may also source data from publicly available sources such as the LinkedIn.

This list is not exhaustive, and due to the nature of the industry there may be times when new categories of personal information may be shared with us for new and evolving reasons, and as a result, we keep this policy under constant review.

We then process it for one of the following reasons:

- To manage our relationship with you
- To provide services to you
- To respond to your enquiries
- To comply with our legal obligations as a business
- To get in touch with you about services that may be of interest to you
- To advise you in relation to the services you purchase from us.

More detailed examples may include:

- In order to fulfil our obligations to you when providing you with our services

- To share your information with others where necessary to fulfil our services for you
- To comply with our statutory and regulatory obligations, including verifying your identity, prevention of fraud and money laundering, immigration and to assess your credentials.
- To provide you (or to enable third parties to provide you) with information about goods or services that we feel may be of interest to you, where you have provided permission for us to do so: or,
- if you are already an existing customer, where we choose to contact you by electronic means (including e-mail or SMS) with information about our own services similar to those which you have already obtained from us, or have negotiated to obtain from us. You can unsubscribe at any time from these marketing messages.
- For statistical purposes so we can analyse figures to help us manage our business and plan strategically for the future
- To notify you about changes to our services or business.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for our processing this information are:

- **Your consent.** Where consent has been given, you are able to remove your consent at any time. You can do this by contacting us
- **We have a contractual obligation.** For example, where the processing is necessary for the performance of a contract to which you are a party, or to take steps prior to entering into a contract with you, for us to provide you with our products and services.
- **We have a legal obligation.** For example, where processing is necessary in order for us to meet our requirements under the Money Laundering legislation, or to provide information to law enforcement organisations or the Courts.
- **We have a legitimate interest.** For example, where it is necessary for the purposes of our legitimate interests, except where our interests are overridden by the interests, rights or freedoms of affected individuals (such as you).

To determine this, we shall consider several factors, such as what you were told at the time you provided your data, what your expectations are about the processing of your personal data, the nature of the personal data, and the impact of the processing on you. Our legitimate interests may include processing necessary to improve and to promote our services and product and to better understand our customers' interests and knowledge of the market and to administer the technical aspects of our service and products.

Or on rarer occasions:

- Where we need to protect your interests (or someone else's interests); and/or
- Where it is needed in the public interest or for official purposes

### **Employees, Subcontractors and Suppliers:**

If you are an employee of Build Concierge, or have applied to join us, please refer to the Employee Privacy Handbook. This document provides further detail on how your information is collected and used.

If you are a subcontractor or supplier with Build Concierge, then please contact us at the details below for more information on how we process your information and for details of how long the data will be retained.

If you are an employee, subcontractor or supplier of one of our Build Concierge Clients, then please contact their Data Protection Officer or appropriate contact using the contact information contained in their privacy policy, which is usually provided on their website.

### **Website Cookies**

Cookies are small files of letters or numbers downloaded onto a device when users access websites. We do not use cookies by default, and they are not required for users to browse and use our website, however if third party services are introduced (for example for marketing campaigns) then cookies may be used to track the success of these services.

### **Data Sharing**

We only share information where there is a legal, regulatory or professional obligation to disclose your personal information, to apply the relevant rules and/or to protect the rights or safety of all parties.

Sometimes we might share your data with third parties. This could include:

- Engaging third-party service providers to perform a variety of business operations on our behalf. For example, service providers we use for specific purposes, such as for our IT systems, legal counsel for the provision of legal advice and guidance, or contractors who may be providing maintenance or repairs to a property in which you may be residing in.
- Regulatory authorities, law enforcement agencies and courts.
- In the event of a sale of all or a part of our business, the buyer and its professional advisers.
- If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation, or to protect the rights, property, or safety of our company, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

### **Third Party (Sub-Processor) Organisations**

For our general day to day data processing activities, we use third party organisations or systems to help us administer and monitor the services we provide:

- for the provision of IT and software services (e.g. Microsoft who provide our office software) to enable the management of our customers, staff and office administration
- for financial transactions and accounting
- to share newsletters, promotional detail, industry news or other information that maybe of interest to you
- to help us improve our services
- for the administration of our website and customer interactions
- for any legal guidance in the provision of our services

Access to your personal information is only allowed when required by the law or is required as part of fulfilling our service obligations. We do not, and will never, sell your personal information to other third parties.

## **International transfers**

There are times where your personal data may be transferred outside the UK. For example, where the services we provide to you involve parties in other countries or where we have partners and service providers based outside of the UK (e.g. Microsoft for our IT Services), your personal data may be accessed or otherwise processed in other countries.

We have implemented measures and safeguards to ensure that any transfer of data is compliant with our data protection laws. For example, based on a decision by the UK Government where the UK Government has recognised that the country to which your data will be transferred ensures an adequate level of protection. In the case of transfers not recognised as adequate by the UK Government we ensure that Standard Contractual Clauses or International Data Transfer Agreements that are approved by the Information Commissioners Office (ICO), the UK Government and/or European Commission are in place after carrying out a detailed assessment to ensure the companies receiving your data can comply with these Clauses. Please contact us if you wish to know more.

## **Keeping your information safe and secure**

We are committed to keeping personal information secure to protect it from being inappropriately or accidentally accessed, used, shared or destroyed, and against it being lost. We endeavour to ensure that our suppliers take similar steps to keep your data secure. We take organisational measures to keep information secure and provide regular training for staff on data protection.

## **How long will we keep your data**

We will only retain your data for as long as necessary to fulfil the purposes we collected it for originally. Once those purposes have been achieved then, unless a different purpose for processing your data arises, it will be permanently deleted.

For example, we will usually archive and retain your personal data for 12 months after the last point of contact we had with you, or from the end of our contract with you. There may be occasions, depending on the service you have chosen to use us for, which may require a longer retention period.

## **Your data protection rights**

Under data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.
- **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, in certain circumstances.
- **Your rights in relation to automated decision making & profiling** - As a matter of principle, you have the right not to be subject to a decision based solely on automated processing, including profiling. However, we may automate such a decision if it is necessary for the entering into or performance of a contract between us, authorised by law or regulation or if you have given your explicit consent.

You are not usually required to pay any charge for exercising your rights. If you make a request, we have a calendar month to respond to you.

Please contact us if you wish to make a request.

### **Our Contact Details:**

We take the processing and protection of your personal information seriously. However if you have any queries, please contact us using the details below:

Telephone: 03330 111 111

Email: [concierge@buildconcierge.com](mailto:concierge@buildconcierge.com)



## **How to complain**

If you have any concerns about our use of your personal information, you can make a complaint to us using the contact details above. In line with recent legislation (the Data Use and Access Act), we would ask that you contact us in the first instance prior to contacting the Information Commissioners Office. However, if you remain dissatisfied, you can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

This Privacy Notice was last reviewed and updated August 2025