
DATA PRIVACY POLICY

AMALYTICA Limited (“**AMALYTICA**”, “**we**”, “**us**”) is committed to protecting personal data. This Privacy Policy explains how we process personal data in connection with the services we provide, in accordance with the UK General Data Protection Regulation (“**UK GDPR**”) and the Data Protection Act 2018 (“**DPA 2018**”), as amended, including by the Data (Use and Access) Act 2025 (“**DUAA**”). The supervisory authority for data protection in the UK is the Information Commissioner’s Office (“**ICO**”).

We process personal data of:

- our clients and prospective clients who are individuals;
- where a client is a company or other organisation, the individuals who represent it and the client’s employees and collaborators; and
- individuals whose data we receive from clients or other sources.

Where personal data is not obtained directly from the data subject, its source is those clients or other sources, and the categories of data are those set out in section IV.

I. Data Controller

The data controller is AMALYTICA Limited, a company incorporated in England and Wales under company number 16934696, with registered office at Summit House, 12 Red Lion Square, London, England, WC1R 4HQ.

For any matter relating to the processing of personal data, you can contact us at office@amalytica.com or by post at our registered office.

AMALYTICA has not appointed a Data Protection Officer.

II. Purposes of processing and lawful bases

We process personal data for the following purposes and on the following lawful bases under Article 6 of the UK GDPR:

- to conclude and perform a contract for the provision of services (Article 6(1)(b)); for data of individuals representing a corporate client and of the client’s employees and collaborators, the basis is our and the client’s legitimate interests (Article 6(1)(f));
- to comply with our legal obligations (Article 6(1)(c)), in particular under anti-money-laundering, accounting and financial-services legislation;
- for our legitimate interests (Article 6(1)(f)), in particular to establish, exercise or defend legal claims, ensure the security of our resources, identify conflicts of interest, prevent misuse, and for archiving and statistical purposes;
- to promote and carry out direct marketing of our services, with consent (Article 6(1)(a)); electronic direct marketing is also carried out in accordance with the Privacy and Electronic Communications Regulations 2003 (“**PECR**”), including the “soft opt-in” where applicable;
- for recruitment of employees or collaborators (Article 6(1)(a) and (c));
- to protect the vital interests of a data subject or another individual (Article 6(1)(d)).

III. Categories of personal data

We process personal data to the extent necessary to provide our services and to comply with legal obligations, in particular the following categories:

- identification and contact data — e.g. name, company, position, address, e-mail address, telephone number;
- billing and payment data — data needed to issue an invoice, transaction identifiers and payment information;
- order and contract data — information on ordered reports, purchase history and related correspondence;
- account data — where an account is created, including login credentials and a password stored in secured form;
- data arising from legal obligations — including accounting and tax records and, where applicable, anti-money-laundering verification data;
- technical and usage data — e.g. IP address, device data, logs and cookie identifiers, as described in our Cookie Policy;
- data provided by the client — necessary to provide services in a specific case.

IV. Recipients of personal data

We take care to keep personal data secure and do not transfer it to any person or entity not authorised to receive it. In addition to our authorised staff, personal data may be shared with:

- providers of hosting, IT, accounting, tax and audit services;
- our banks (in connection with payments);
- courts, public authorities and bodies performing public tasks, where required by law;
- professional advisers, including lawyers, where necessary; and
- other recipients, with the data subject's consent.

V. International transfers (outside the UK)

As a rule, AMALYTICA does not transfer personal data outside the United Kingdom. Where a transfer to a third country is necessary, we make it only where a lawful transfer mechanism under the UK GDPR applies, namely: UK adequacy regulations made by the Secretary of State; appropriate safeguards, in particular the ICO's International Data Transfer Agreement (IDTA) or the UK Addendum to the EU standard contractual clauses; or an applicable exception under Article 49 of the UK GDPR. Transfers to the European Economic Area are permitted. Information about the safeguards applied, and how to obtain a copy, is available on request.

VI. Retention

We keep personal data for no longer than is necessary for the purposes for which it is processed, in particular:

- data relating to a contract — for the term of the contract and, afterwards, for the limitation period for claims;
- accounting and tax records — for the period required by law (as a rule, 6 years);
- anti-money-laundering records — for the period required by the applicable rules;
- data processed on the basis of consent — until consent is withdrawn.

VII. Your rights

Subject to the limitations set out in law, you have the right to access your personal data, to have it rectified or erased, to restrict its processing, to object to processing carried out on the basis of legitimate interests (Article 21 UK GDPR), and — to the extent it applies under Article 20 UK GDPR — the right to data portability. You may also have rights in relation to automated decision-making. To exercise these rights, please contact us as set out in section I.

VIII. Right to complain

If you consider that we have infringed the UK GDPR in processing your personal data, you have the right to complain to us directly under section 164A of the DPA 2018. You can raise a complaint by contacting us at office@amalytica.com. We will acknowledge your complaint, take appropriate steps to investigate it, and inform you of the outcome without undue delay.

You also have the right to lodge a complaint with the ICO under section 165 of the DPA 2018 (www.ico.org.uk). We would, however, encourage you to contact us first so that we can try to resolve your concern.

IX. Withdrawing consent

Where processing is based on consent, you may withdraw your consent at any time. Withdrawing consent does not affect the lawfulness of processing carried out on the basis of consent before its withdrawal.

X. Cookies and similar technologies

Our website uses cookies and similar technologies as described in our Cookie Policy, in accordance with PECR and the UK GDPR. Certain analytics activities may fall within the exceptions to the consent requirement introduced by the DUAA, in line with current ICO guidance.

XI. Automated decision-making

AMALYTICA does not carry out automated decision-making or profiling of personal data.

XII. Changes to this policy

Any changes to this Policy will be published at www.amalytica.com and take effect from the date of publication. We will give notice of material changes by appropriate means.