

Privacy Notice – First Twenty

We are committed to protecting and maintaining your privacy; this Privacy Notice describes how First Twenty Consulting Ltd (no. 11834750) collects, processes and stores personal data. All information provided to us through this site will be treated as confidential and we will not abuse this trust by providing all or any part of your information to others unless you have consented to this or where this is in our legitimate interests, further outlined below. Your information will never be sold, licensed, loaned or otherwise distributed to any other organisation unless we are required to do so by applicable law. Subject to any overriding obligation to which we are subject, you have the right to object to the processing of your personal information, by a simple request that we stop such processing.

Information that we Collect and our Use

To provide you with further information about the services that we offer and related information, we may collect certain items of personal or business information from you. We will only use this information for the following purposes:

- to understand and appreciate your needs and requirements as a user of our site or our services generally;
- for analysis in relation to the technical specification and user experience of our site, for the purposes of developing and improving our site and the services that we provide;
- to provide relevant information about our services or those that we may offer from time to time; and
- to keep in contact with you.

We may collect this information in various ways, including through our website, in e-mail or written correspondence with you, through our website or directly from you at meetings or events. You have a choice whether to provide any information to us, except where this is necessary to fulfil any contract with you – such as in relation to the provision of our services, or where we are required to do so by applicable law, the failure of which may mean that we are unable to provide our services as you expect.

We do not require a formal Legitimate Interests Assessment (LIA) or a balancing test when processing personal data for the following "recognised" public and business interests (i) ensuring the security of our network, information and for cyber security, (ii) safeguarding vulnerable individuals and (iii) detecting, investigating and/or preventing fraud or financial crime.

Managing Your Preferences, including for Marketing

In addition, we may process your information for marketing purposes (including offers, promotions and updates in relation to our services, that we believe may be of interest to you) either where you are or have been a user of our services in relation to similar goods or services previously or where you have given your explicit consent.

You have the right to manage your preferences in relation to the kinds of information that we collect and the manner in which your information is processed – you can update these preferences at any time through our site; you can also withdraw your consent, either as a whole or in relation to particular kinds of information or delivery methods. We encourage our users and clients to exercise these preferences so that they only receive the information that they wish from us and so that our use of their information is consistent with their own expectations.

You may ask us to erase information that we hold about you, except where there is some other reason requiring us to maintain the information, such as for insurance purposes, for example. We monitor and will also delete information and data that we hold, where we reasonably consider this no longer to be required.

If you have accepted the relevant cookies, we may collect, store and process non-personal information about you automatically as a result of your use of this site, such as the type of internet or mobile browser that you are using to gain access and any website from which you linked to us, but you cannot be identified from this information. We will only use such non-personal information to help provide an effective and more relevant website offering.

In accordance with updated regulations, we drop first-party web analytics cookies onto user devices without prior consent. These cookies are used strictly to measure website performance and improve user experience. Where your browser settings have been set to automatically accept cookies, by remaining on our site, we will take this to mean that you are happy to accept our use of cookies in this way, or will otherwise only do so based on the preferences you indicate, when asked to do so. Where these relate to marketing and tracking cookies, we acknowledge these require explicit user opt-in.

You can update these preferences at any time but please be aware that certain functions of the site may not work as well, or at all, where relevant cookies are blocked.

Service Providers and Third Parties

We may on occasion have the need to transfer your data to suppliers located outside of the European Economic Area (EEA), including in the USA. We will only do so where the legal regimes of those territories outside of the EEA offer an equivalent standard of data protection to our own.

Where it is necessary to provide information to external service providers or partners in relation to services that they provide to us, in order to operate our business or to provide you with the services requested, we have adopted approved model data protection clauses in our arrangements with them, to ensure they meet the same high standards required in

relation to the processing of your personal information under applicable data protection laws.

Compliance under the Data (Use and Access) Act 2025

Individuals have the right to lodge a formal complaint with us in relation to how their personal data is handled, before escalating the matter to the Information Commissioner's Office (ICO).

Any complaint must be submitted to our usual contact e-mail address or via the online contact form on the website. Upon receipt of a complaint, this will be acknowledged in writing, within the required 30 day period of receipt. We will then investigate the matter without undue delay and provide a formal written response of the outcome, which will also then include details about how to escalate the matter to the ICO if the individual, being the subject of the complaint, remains dissatisfied.

Technical and Organisational Measures and Security

We have and maintain appropriate technical and organisational security measures to protect your personal information from and against unauthorised or unlawful use, or accidental loss, damage or destruction, which we review from time to time.

In relation to data security, you accept the risk that data transmitted to us through this site via electronic means may be intercepted before reaching us or may be accessed by unauthorised third parties, or exploited unlawfully. We do not assume any responsibility for guarding against the acts of third parties and shall not be liable for any direct, indirect or consequential losses or damages incurred or suffered as a result.

Your Information and Keeping it Up-to-Date

You have the right to request details of the information that we hold about you. Should you wish to be provided with these details, please contact us with a simple request; this is known as a Subject Access Request (SAR).

To ensure a balanced approach to data access, we apply the following statutory rules whilst processing a SAR (i) Reasonable Search – we are only required to conduct reasonable and proportionate searches for requested data. We are not required to conduct an excessive (including a technically complex) process for the purposes of data retrieval, (ii) Time for Response: the period for our formal response will be paused, whilst we await any reasonable response for clarification regarding the scope or specific requirements of any request; it is understood that in these circumstances the standard 30 day period for our response will be extended or may never restart, if our request for clarification or further information is not actioned and (iii) Applicable Fee: We draw your attention to our right,

under applicable data protection laws, to charge an administrative fee, but only where we reasonably deem the request to be “vexatious or excessive” and where any such fee will be payable in full, before we can look to action any such request.

We wish to keep any information that we hold about you accurate and up to date and therefore please contact us if the information we hold about you needs updating.

If you have any questions or concerns regarding your privacy, or if you experience difficulties in accessing or viewing any site(s) operated by us, please contact us.

We value your feedback in relation to our online presence and therefore welcome any comments or feedback which you may have.