

Node9 Consulting Privacy Notice

This privacy notice tells you what to expect us to do with your personal information.

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Contact details

Email: **info@node9.co.uk**

What information we collect, use, and why

We collect or use the following information to **provide and improve products and services for clients**:

- Names and contact details
- Financial data (including income and expenditure)
- Usage data (including information about how you interact with and use our website, products and services)
- Information relating to compliments or complaints
- Records of meetings and decisions
- Website user information

We collect or use the following personal information for the **operation of client or customer accounts**:

- Names and contact details
- Addresses
- Purchase or service history
- Account information, including registration details
- Marketing preferences

We collect or use the following personal information for **information updates or marketing purposes**:

- Names and contact details
- Addresses

- Marketing preferences
- Website and app user journey information
- IP addresses

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Account information
- Purchase or service history
- Customer or client accounts and records
- Correspondence

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access](#).
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification](#).
- **Your right to erasure** - You have the right to ask us to delete your personal information. [Read more about the right to erasure](#).
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing](#).

- **Your right to object to processing** - You have the right to object to the processing of your personal data. [Read more about the right to object to processing.](#)
- **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. [Read more about the right to data portability.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide and improve products and services for clients** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - At Node9, we collect and use personal information where it is necessary to pursue our legitimate interest of providing and improving our data consultancy services to clients. This includes activities such as communicating with clients and prospects, delivering insights and recommendations, analysing service usage to refine our offerings, and maintaining secure, reliable systems. The processing of this information is essential to ensure we can deliver services that are relevant, effective, and responsive to our clients’ needs. For example, understanding how clients use our services allows us to identify areas for improvement, tailor our

support, and enhance the user experience. We always balance our legitimate interests against the rights and freedoms of the individuals whose data we process. We only collect the minimum data required for specific purposes, do not use it in ways individuals wouldn't reasonably expect, and provide clear ways for individuals to object or opt out when appropriate. The benefits of this processing — such as improved service quality, faster support, personalised insights, and a more secure service environment — are carefully considered and, we believe, outweigh any potential risks. Where risks exist, we take appropriate steps to minimise them through data minimisation, encryption, access controls, and regular reviews of our practices. We never use personal information for automated profiling or marketing without consent, and we do not share data with third parties unless it is necessary for service delivery or required by law.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for the **operation of client or customer accounts** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We process personal information as part of the legitimate interest in operating, maintaining, and supporting client or customer accounts. This includes collecting and storing contact details, billing information, project-related communications, and account preferences necessary to manage the relationship and deliver our services effectively. This processing is essential to fulfil our contractual obligations, provide a seamless client experience, ensure accurate invoicing, and maintain a clear record of our

interactions. It also enables us to respond quickly to client requests, provide updates on services, and deliver tailored advice or support. The benefits of this processing include improved service continuity, accountability, and efficiency for both parties. Clients receive more responsive, accurate, and context-aware support, while we can ensure we meet service expectations and legal or regulatory requirements (such as financial recordkeeping). We ensure that this data processing is proportionate and limited to what is necessary for account management purposes. Individuals would reasonably expect their information to be used in this way when engaging with a professional services provider. Any potential risks to individuals are minimised through strict access controls, secure storage, and transparent communication. We do not use this information for unrelated marketing purposes without consent, and individuals can contact us at any time to access, update, or object to how their information is being used.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **information updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We may process personal information under our legitimate interest to keep clients, partners, and interested individuals informed about our services, updates, insights, and relevant industry developments. This includes sending newsletters, event invitations, service announcements, or thought leadership content that we believe may be useful or valuable based on our existing relationship. This processing supports our business growth and helps clients stay informed about

opportunities, updates, and best practices in data, digital transformation, and AI – areas where ongoing knowledge sharing is essential for mutual success. We ensure that our communications are relevant, proportionate, and targeted to individuals who have an existing relationship with Node9 or have expressed interest in our services. All marketing messages include a clear and easy way to unsubscribe or update preferences at any time. The benefits of this processing include enhanced client engagement, access to useful resources, and a stronger connection between Node9 and the communities we serve. These benefits are carefully weighed against the minimal impact of receiving such communications, which individuals can opt out of at any point. We do not sell or share personal information for marketing purposes with third parties, and we never send marketing content without a lawful basis — either legitimate interest or prior consent, depending on the context and applicable regulations.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We process personal information under our legitimate interest to respond to queries, resolve complaints, and manage any legal or contractual claims in a fair, timely, and effective manner. This includes collecting relevant contact details, communication records, and any supporting documentation provided by the individual involved. This processing is necessary to ensure that we can provide clear, accountable,

and responsive service. It allows us to investigate issues thoroughly, provide accurate responses, improve client satisfaction, and take appropriate steps to resolve problems or disputes. Handling these matters responsibly is an essential part of running a professional service and maintaining trust with clients and stakeholders. Individuals expect that when they raise a concern, it will be treated seriously and handled appropriately — and personal data is required to do this effectively. The benefits of this processing include faster resolution of concerns, improved service standards, and better protection of the rights and interests of all parties. These benefits outweigh the minimal risks involved, which we reduce through secure handling of data, limiting access to only those involved in resolving the issue, and ensuring transparency throughout the process. We do not use the information collected during complaints or claims for unrelated purposes and retain it only for as long as necessary to manage the issue and meet legal or regulatory obligations.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Where we get personal information from

- Directly from you
- Previous employment
- Market research organisations
- Providers of marketing lists and other personal information
- Suppliers and service providers

How long we keep information

We only retain personal information for as long as it is necessary to fulfil the purposes for which it was collected, including to meet legal, regulatory, contractual, or reporting obligations. Our data retention schedule is designed to ensure that information is not kept longer than needed. For example, contact and account information will be retained while a client relationship is active and for a reasonable period afterward to manage renewals, queries, or legal obligations. Marketing data is reviewed regularly and removed upon request or after periods of inactivity. We securely delete or anonymise personal data when it is no

longer required, and we regularly review our systems and processes to ensure compliance with this policy.

Who we share information with

Data processors

HubSpot CRM

This data processor does the following activities for us: We use HubSpot as a trusted third-party data processor to help manage and streamline our customer relationship management (CRM), marketing communications, and service delivery. HubSpot processes personal information on our behalf in accordance with our instructions and applicable data protection laws.

Others we share personal information with

- Professional or legal advisors
- Organisations we're legally obliged to share personal information with
- Professional consultants

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>