Noir Space BH Customer Privacy Notice

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

Contact details

Email

support@noirspacebh.com

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
- Addresses
- Occupation
- 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

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

- Contact details (e.g. name, address, telephone number or personal email address)

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

- Names and contact details
- 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:

- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **Legal obligation –** we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- **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:

- **Primary Basis for Providing Services: Contract**
  We must process our clients\data (such as consultancy notes, account logs, meetings, session purchases, or mentoring history) to deliver the service they have signed up for or purchased.
  Primary Basis for Improving Products Services: Legitimate interests
  We internally analyse usage trends, gather internal feedback on services provided, and optimizing our delivery workflows benefits our organisation's growth and service quality without causing an undue risk of harm to your clients.

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:

- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **Legal obligation** – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

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

- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **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:

- **Primary Basis (General Applications & Selection): Legitimate interests**
  We evaluate registration forms, review expression of interest forms, conduct scope interviews, deliver training, and managing a pipeline of prospective school speakers or network professionals that directly benefits our organisation's operational capacity.
- **Secondary Basis (Pre-Contractual Steps): Contract**
  For roles that transition into formal unpaid genuine volunteers on a (3-day max deployment within a 30 day period), processing their final onboarding information is necessary specifically to enter into that volunteer agreement framework.

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:

- **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.
- **Primary Basis for Queries & Complaints: Legitimate interests**
  It is in the legitimate interest of both our organisation and the individual to efficiently respond to questions, resolve service disputes, and maintain good customer relations.
- **Primary Basis for Legal Claims: Legitimate interests**
  Our organisation has a clear right to process, retain, and review relevant communication logs or service history to establish, exercise, or defend itself against potential legal claims.

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
- Publicly available sources

How long we keep information

Our organisation strictly adheres to the UK GDPR Storage Limitation principle and does not hold personal data indefinitely. We maintain standard retention windows calculated using statutory limitation periods, regulatory guidance, and operational necessities:

- **Standard Commercial Data:** Preserved for a maximum baseline of **6 years** following the formal termination of a relationship to comply with **HMRC guidelines and the Limitation Act 1980** (covering breach of contract windows).
- **Vetting and Application Material:** Erased within **2 years** of the recruitment campaign's conclusion to protect candidate privacy and satisfy the **Equality Act 2010** tribunal timelines.
- **Special Categories & Criminal Convictions:** Please note that we don't process DBS checks because the volunteers are not used more than 3 days within a 30-day calendar month.
- **System Backups:** When data reaches its expiration date and is purged from live databases, it will be comprehensively overwritten or deleted from all electronic backup systems within **30 days** in line with our backup rotation cycle.

Secure Erasure Methods

Upon reaching a data asset's expiration timeline, information is rendered permanently unrecoverable via secure cross cut shredding for physical documents / cryptographic erasure and permanent server wiping for digital assets or external devices.

How to complain

If you have any concerns about our use of your personal information, you can make a data protection complaint to us:

Email: support@noirspacebh.com
You can view our data complaints procedure at this link HERE

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:
ICO Head Office
4th Floor, No.3 Circle Square
5 Hawkshaw Street
Manchester
M1 7BL

Helpline number: 0303 123 1113
Website: https://www.ico.org.uk/make-a-complaint