

# Privacy Policy

Cavis Marketing Limited

Version 1.0



# Introduction

This Privacy Notice ("Notice") explains how Cavis Marketing Limited ("Cavis," "we," "our," or "us") collects, processes, and protects personal data in the course of providing our services and conducting business operations. It also outlines the rights and choices available to you regarding your personal data.

We are committed to handling personal data lawfully, fairly and transparently in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Please read this policy carefully to understand how and why we process your data.

## Company Information

Cavis Marketing Limited is a company registered in England & Wales. Company Registration Number: 16437994, with its registered office at Cavis Marketing Limited, C/O Brabners LLP, 100 Barbirolli Square, Manchester, M2 3AB.

Cavis Marketing Limited is an independent Data Controller of Personal Data and registered with the Information Commissioner's Office (ICO) under registration number ZB897675.

**Email Address:** [privacy@cavis.co.uk](mailto:privacy@cavis.co.uk)

## What Personal Data We Collect

We may collect and process the following categories of Personal Data:

Category	Examples
<b>Identity</b>	Information that is capable of identifying you as an individual, including but not limited to, title, gender, forename, and surname.
<b>Contact</b>	Information used for contact or commercial service purposes, including but not limited to, a valid email address, valid mobile telephone number, and valid landline telephone number.
<b>Employment</b>	Information relating to your employment, including but not limited to, roles, titles, directorships, ownership, and professional appointments.
<b>Marketing</b>	Information about your marketing preferences and interactions, including but not limited to, consent records, opt-in status, opt-out status, and marketing/communication preferences.

<b>Correspondence</b>	Information contained in communications with you, including but not limited to, emails, letters, call recordings, and notes of conversations.
<b>Technical</b>	Information collected when you use our websites or systems, including but not limited to, device type, browser, session data, operating system, and interaction data via cookies and analytics tools.
<b>Complaints</b>	Information relating to complaints or feedback you submit, including but not limited to, complaint details, investigation records, complaint outcomes, complaint correspondence.
<b>Data Protection</b>	Information relating to data protection rights requests and regulatory compliance, including but not limited to, data protection rights requests, request records and responses, and ICO correspondence.

## How We Collect Personal Data

We may collect Personal Data about you:

### Directly

We may receive your personal information from you when:

- You complete an online web form
- You contact us by telephone
- You contact us by email
- You contact us by post
- You submit feedback or surveys
- Automatically by cookies or analytics technologies when using our websites

### Indirectly

We may obtain personal information about you from:

<b>Source</b>	<b>Personal Data</b>
<b>Companies House</b>	We may obtain personal data about you from Companies House, including full names, appointments, directorships, shareholding, and influence.

**Review  
Platforms**

We may obtain personal data about you from online review platforms, including full names, feedback, and role/appointments.

**Regulators**

We may obtain personal data about you from regulators such as the Solicitors Regulation Authority (SRA), including full names, employment information, and regulatory status.

Where we obtain personal data from publicly available sources, we will provide this Privacy Notice at the first point of contact or within one month of obtaining the data, unless an exemption under Article 14(5) UK GDPR applies.

## Purposes and Lawful Basis of Processing

Under the UK GDPR, we must identify a lawful basis for each purpose of processing. We rely primarily on consent and legitimate interests, and where necessary on legal obligation. We have set out the purposes and Lawful Bases for processing personal data as follows:

<b>Purpose</b>	<b>Description</b>	<b>Lawful Basis</b>
<b>Services</b>	To respond to and negotiate commercial service enquiries, fulfil orders, and provide services.	Legitimate Interests – Article (6)(1)(F) UK GDPR as it is necessary for us to process contact and employment information of representatives of corporate clients and prospective clients in order to respond to enquiries, negotiate and perform commercial contracts, manage relationships, and operate our business effectively.
<b>Marketing</b>	To send you marketing communications by the contact channels you have selected (SMS, Email and/or WhatsApp) about our commercial services.	Legitimate Interests – Article (6)(1)(F) UK GDPR for business-to-business marketing communications sent to corporate subscribers. we consider this processing to be necessary for our commercial operations and proportionate in a corporate context, as it relates to individuals acting in a professional capacity. We ensure that communications are relevant to the recipient’s business role, that clear opt-out mechanisms are provided, and that we

		<p>comply with the Privacy and Electronic Communications Regulations (PECR).</p> <p>Consent – Article 6(1)(A) UK GDPR or ‘Soft Opt-In’ - Regulation 22(3) of the Privacy and Electronic Communications Regulations 2003 (PECR) For marketing communications sent to individual subscribers (such as sole traders and certain partnerships), we rely on prior consent or, where applicable, the soft opt-in in accordance with Regulation 22(3) PECR.</p>
<b>Marketing Preferences</b>	To manage your marketing preferences, opt-outs and screening.	<p>Legal Obligation – Article 6(1)(C) UK GDPR to comply with the Privacy and Electronic Communications Regulations (PECR) and UK GDPR suppression requirements.</p>
<b>Complaints</b>	To investigate and resolve complaints in accordance with regulatory and contractual obligations, including to record complaints, investigate, respond to complainants.	<p>Legitimate Interests – Article (6)(1)(F) UK GDPR as it is necessary to investigate and resolve complaints, maintaining accurate records, improving our services, and protecting our legal and regulatory position. This processing is necessary to respond appropriately to concerns raised and to ensure fair and accountable handling of complaints.</p>
<b>Data Protection</b>	To comply with applicable legal and regulatory obligations, including data protection compliance, record-keeping/audit trails.	<p>Legal Obligation – Article 6(1)(C) UK GDPR to comply with the Privacy and Electronic Communications Regulations (PECR) and UK GDPR suppression requirements.</p>

## Disclosure of Personal Data

We may share personal data with:

- Internal staff requiring access for service delivery, all of whom have received data protection training
- Professional advisors (e.g., legal, financial, insurance consultants)

- Third-party IT, marketing, and cloud service providers acting as Data Processors, where necessary, to provide our services
- Any entity involved in a sale or restructuring of our business

## International Transfers

Some data may be processed outside the UK or EEA, such as when using cloud services. We will always ensure such transfers comply with UK and EU data protection laws using appropriate safeguards.

## Automated Decision-Making

We do not make decisions about you based solely on automated processing that has legal or similarly significant effects. If we ever implement such technologies, we will do so only where permitted by law or based on your explicit consent, and with appropriate safeguards, including the right to obtain human review

## Data Security

We have implemented appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, misuse, alteration, or disclosure. These include encryption, access controls, secure servers, staff training, and contractual data-processing safeguards with our suppliers. We review our security arrangements regularly to ensure they remain effective and proportionate to the nature, scope, context, and purposes of our processing. In the event of a personal data breach, we have procedures in place to identify, investigate, and notify the Information Commissioner's Office and affected individuals where legally required.

## Data Storage & Retention

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected or to meet legal, regulatory, or operational requirements. Where it is not possible to specify an exact retention period, we determine the appropriate duration by considering factors such as: the nature and sensitivity of the personal data; the potential risk of harm from unauthorised use or disclosure; the purposes for which we process the data; whether those purposes can be achieved through other means; our contractual and legal obligations; and applicable limitation periods for potential claims or regulatory investigations.

For specific retention periods, please contact us at [privacy@cavis.co.uk](mailto:privacy@cavis.co.uk).

## Your Data Subject Rights

Under the UK GDPR, you have the following Data Subject Rights; however, not all Rights are absolute and, in some cases, shall not apply.

- The right to be informed about how your personal data is used.
- The right of access to your personal data.
- The right to rectification of inaccurate or incomplete personal data.
- The right to erasure ('right to be forgotten') in certain circumstances.
- The right to restrict processing.
- The right to data portability.
- The right to object to the processing (including for direct marketing or processing based on legitimate interests).
- Rights in relation to automated decision-making and profiling.

To exercise your rights, or if you have any concerns about how we process your personal data, please contact us at [privacy@cavis.co.uk](mailto:privacy@cavis.co.uk)

## Your Right to Withdraw Consent

Where processing is based on your consent, you have the right to withdraw that consent at any time. This will not affect the lawfulness of any processing carried out before withdrawal.

## Your Right to Withdraw Consent for Direct Marketing

To withdraw consent for direct marketing purposes, please contact [privacy@cavis.co.uk](mailto:privacy@cavis.co.uk). Alternatively, you can withdraw consent at any time by using the unsubscribe mechanisms included within direct marketing communications received by SMS, WhatsApp, or email.

## Data Subject Rights Conditions

<b>Data Subject Right</b>	<b>Conditions</b>
<b>Right of Access</b>	The Right to Access can be restricted where disclosure would adversely affect the rights of others, involve disproportionate effort, or fall within specific exemptions under the Data Protection Act 2018. The Right to Access can also be refused if it is manifestly unfounded or excessive.
<b>Right to Rectification</b>	The Right to Rectification shall not apply if the data is accurate, if an exemption applies or if the request is manifestly unfounded or excessive.

## **Right to Erasure**

Generally, the Right to Erasure shall apply if the personal data is no longer necessary for the purpose(s) which it was originally collected or processed for, where the lawful basis for processing is consent and the individual has withdrawn their consent, if the lawful basis for processing is legitimate interests and the individual has objected to the processing provided there is no overriding legitimate interest to continue the processing, where the personal data is processed for direct marketing purposes and the individual has objected to that processing, where the personal data has been processed unlawfully, or where erasure is necessary to comply with a legal obligation.

It shall not apply where the processing is necessary for the establishment, exercise or defence of legal claims, to comply with a legal obligation. The request can also be refused if it is manifestly unfounded or excessive, or a specific exemption applies.

## **Right to Restrict Processing**

The Right to Restrict Processing shall generally apply if the individual contests the accuracy of their personal data and we are verifying the accuracy of that data, where personal data has been processed unlawfully and the individual opposed erasure in favour of a request to restrict that data, where we no longer need the personal data but the individual needs us to retain it to establish, exercise or defend a legal claim, or the individual has objected to the processing and we are considering whether our legitimate grounds override those of the individual.

It shall not apply if an exemption applies or if the request is manifestly unfounded or excessive.

## **Right to Data Portability**

The Right to Data Portability shall apply if it concerns information that an individual has provided to the Controller and only if the lawful basis for processing is consent or for the performance of a contract. It may also apply if the processing is carried out by automated means.

It shall not apply if an exemption applies or if the request is manifestly unfounded or excessive.

## Right to Object

You have an absolute right to object to your personal data being used for direct marketing and in some cases where we process the personal data is processed if the lawful basis for that processing is legitimate interests.

In other circumstances, the Right to Object shall not apply where we can demonstrate compelling legitimate grounds that override the individual's interests, rights and freedoms, or for legal claims.

## Rights Related to Automated Decision-making and Profiling

Rights Related to Automated Decision-making and Profiling may still lawfully occur if an exception applies and suitable safeguards are in place.

## Complaints

You have the right to lodge a complaint with the Information Commissioner's Office (ICO) at any time. We encourage you to contact us first so that we can seek to resolve your concerns promptly.

You can make a complaint about the handling of your or other people's personal information, usually in the following circumstances:

- We have not properly responded to your request for your personal information.
- We have not kept your information secure.
- We hold inaccurate information about you.
- We have disclosed information about you.
- We keep information about you for longer than necessary.
- We have collected information for one reason and are using it for something else; or
- We have not upheld any of your data protection rights.

If you wish to make a complaint about how we have handled your personal data, please use the following contact information and allow one month to enable us to investigate and respond:

**Registered Office Address:** Cavis Marketing Limited, C/O Brabners LLP, 100 Barbirolli Square, Manchester, United Kingdom, M2 3AB

**Email Address:** [privacy@cavis.co.uk](mailto:privacy@cavis.co.uk)

## Complaints to the Information Commissioner's Office (ICO)

If you are dissatisfied with our response, you have the right to complain to the **Information Commissioner's Office (ICO)**:

**Postal Address:** Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

**Phone:** 0303 123 1113

**Online:** <https://ico.org.uk/make-a-complaint/personal-information-complaint/>

**Website:** [www.ico.org.uk](http://www.ico.org.uk)

## Cookies

Our website uses cookies and similar technologies to ensure it functions correctly, to analyse usage, and to deliver relevant content and advertising. We use Cookiebot to manage cookie consent and compliance with the UK GDPR and the Privacy and Electronic Communications Regulations (PECR).

Strictly necessary cookies operate on the basis of our legitimate interests in providing a secure and functional website. All other cookies, including those used for statistics and marketing, are deployed only with your consent.

You can review, adjust, or withdraw your consent for non-essential cookies at any time via the Cookiebot banner or by selecting “Cookie Settings” in the website footer.

## Updates to this Policy

We may update this privacy policy from time to time. We will publish any changes on our website and, where appropriate, notify you by other means. The date at the bottom of this page indicates when it was last revised.

Last Updated: 25/02/2026.

## Revision History

V1.0 February 2026: Created