

Fusion21 - Privacy Policy

Effective Date: 18 August 2025 Version: FOUR (18 August 2025)

Fusion21 Ltd ("Fusion21", "we", "us", or "our") is committed to protecting and respecting your privacy. This Privacy Policy outlines how we collect, use, and safeguard your personal data when you visit our website at www.fusion21.co.uk, interact with us, or use our services.

1. Who We Are

Fusion21 Ltd is a member-focused organisation providing procurement and social value services. We are registered in the UK and our registered office is:

Fusion21 Ltd Unit 2, Puma Court Kings Business Park Prescot, Merseyside L34 1PJ

2. Information We Collect

We may collect and process the following types of personal data:

- Contact Information: Name, email address, phone number, job title (e.g. via forms or feedback).
- Membership Data: Details provided during membership registration or account creation.
- o Communications: Emails sent to us, feedback forms, and survey responses.
- Email Engagement Data: Information on whether you open our emails and which links you click on.
- Technical Data: IP address, browser type/version, time zone settings, and operating system.
- Usage Data: How you use our website (via cookies, analytics tools, and page tagging).

3. How We Use Your Data

We process your data for the following purposes:

- o To administer and manage your membership
- o To provide services you have requested

- To improve our website and services by understanding how users interact with us online
- To respond to your enquiries and feedback
- To send email alerts and other communications you have opted into
- To deliver relevant marketing communications (where permitted)
- To learn about the effectiveness of our services, processes, communications and marketing and make necessary improvements.

4. Legal Bases for Processing personal data

<u>Contractual:</u> We may use and process your information where it is necessary to do so in order to process a supplier/member agreement, process enquiries, orders and payments or to provide you with a refund.

<u>Legitimate interest:</u> We may use your personal information where it is our legitimate interest as a business to do so. This may include but is not limited to:

- Verifying your identity
- To provide support, respond to and communicate with you
- o To contact you if we need to obtain additional information
- To check our records are correct
- To request feedback on our service and offering
- For marketing activities (other than when we rely on consent), such as personalising marketing messages through social media and other third-party platforms.
- To comply with a request from you in connection with the exercise of your rights (for example where you have asked for us not to contact you for marketing purpose), we will keep a record of this on our suppression list in order to comply with your request.
- To send communication to you about your membership
- o To enable you to interact with us through the Fusion21 social media channels

We rely on the following legal bases to process your data:

- Consent: Where you have provided clear consent for processing (e.g. marketing emails).
- o Contractual Necessity: To fulfil our obligations under a contract with you.

- Legitimate Interests: For purposes such as improving services, fraud prevention, or internal administration.
- Legal Obligation: Where processing is required by law.

5. Sharing Your Information

To provide the best possible service to you and continue to monitor our performance, we may share your personal data with:

- o Internal departments (e.g. marketing, membership services)
- Digital marketing and PPC agencies that help us run campaigns, analyse website traffic, and deliver targeted advertising. This may include data such as cookie identifiers, IP addresses, and website user behaviour.
- Trusted third-party service providers who work with us to provide better user experiences for our service users – (e.g. email platforms, web hosting)
- Regulatory bodies or legal authorities, where required by law

We do NOT sell data to any third parties.

All third parties we work with are required to comply with applicable data protection laws and process your data only on our instructions.

You may have the right to object to certain uses of your data for marketing purposes, including profiling and targeting, as outlined in Section 7 below.

6. Data Retention

We retain personal data only for as long as necessary and for the purposes it was collected, typically for the duration of your membership or until you request deletion, unless a longer retention period is required by law.

7. Your Data Protection Rights

Under the UK GDPR, you have the right to:

- Access Request a copy of the personal data we hold about you
- Rectification Request correction of inaccurate or incomplete data
- Erasure Request deletion of your data where appropriate
- Restriction Request limitation on the processing of your data
- Objection Object to processing, including for direct marketing or profiling
- Portability Request that your data be transferred to another organisation

 Withdraw Consent - Where we rely on your consent, you may withdraw it at any time.

To exercise your rights, please contact us:

Email: info@fusion21.co.uk

Post: Fusion21 Ltd, Unit 2, Puma Court, Kings Business Park, Prescot, Merseyside,

L34 1PJ

We aim to respond to all requests within 30 days.

8. Email Communications

You can sign up to our email marketing list online or request to be added via a face-to-face meeting with a Fusion21 employee, phone call or email.

We will only collect your name, organisation and email address for email marketing purposes, this data will be used solely by Fusion21 to keep you up to date with Procurement advice, news, invitations to events and sharing updates in relation to Fusion21. Fusion21 will never send you unsolicited 'junk' emails, third-party emails or share your personal information with third parties without your consent.

The customer data you submit when you sign up to receive emails is stored with HubSpot, our email marketing system. HubSpot gathers statistics around e-mail open rates and clicks as well as other metrics in order to assist us in monitoring and improving our marketing communications.

HubSpot engages third-party providers to collect usage data. For full information on HubSpot's privacy policy, click here.

You can unsubscribe or change your email preferences at any time using the "unsubscribe" link in our emails.

9. Social media

Comments made on our social media platforms will be shared under the terms of the relevant social media platform and could be made public. These social media platforms are not controlled by Fusion21 and as such, we are not responsible for any such sharing.

10. Data Transfers

Your personal data is generally processed in the UK. If data is transferred outside the UK, we ensure that appropriate safeguards (such as Standard Contractual Clauses) are in place.

11. Use of Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular website. Cookies allow web applications to respond to you as an individual, the web application can then tailor its operations to your requirements, likes and dislikes by gathering information about your preferences.

We use cookies and similar technologies to enhance your experience on our website, analyse site traffic, and improve our services.

Some cookies are essential for site functionality, while others help us improve performance or deliver relevant content and advertising. We may also use trusted third-party tools that set their own cookies in line with their privacy policies.

We use Google Analytics to collect information and details of visitor behaviour. This data helps Fusion21 analyse data about pages viewed, user journeys and call to action. We do not use cookies to collect or record information such as your name, address or other contact details. Data is held on Google Analytics for a period of 24 months and will be removed monthly thereafter.

We use the lead generation service provided by Leadinfo B.V., Rotterdam, The Netherlands, which recognises visits of companies to our website based on IP addresses and shows us related publicly available information, such as company names or addresses. In addition, Leadinfo places two first-party cookies for providing transparency on how our visitors use our website and the tool processes domains from provided form inputs (e.g. "leadinfo.com") to correlate IP addresses with companies and to enhance its services. For additional information, please visit www.leadinfo.com. On this page: www.leadinfo.com/en/opt-out you have an opt-out option. In the event of an opt-out, your data will no longer be used by Leadinfo".

You can manage or disable cookies at any time through your browser settings. Please note that blocking some types of cookies may impact your experience on our site.

By continuing to use our website and not opting out, you agree to our use of cookies.

12. Links to other Websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, please note that we do not have any control over those websites.

As a result, we cannot be held responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by the Fusion21 Privacy statement.

You should exercise caution and review the privacy policy for those sites.

13. Complaints

If you have concerns about how we handle your data, please contact us first so we can address the issue. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO):

Website: https://ico.org.uk Phone: 0303 123 1113

14. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, legal requirements, or for other operational reasons. When we do, we will revise the "Effective Date" at the top of this page.

If the changes are minor, we will provide a prominent notice on our website or contact you directly (where appropriate) before they take effect.

We encourage you to review this Privacy Policy periodically to stay informed about how we protect your information.

15. Contact Us

If you have any questions about this policy or your data, contact us at:

Email: info@fusion21.co.uk

Post: Fusion21 Ltd, Unit 2, Puma Court, Kings Business Park, Prescot, Merseyside, L34 1PJ