

PRIVACY & COOKIES POLICY

The Efficient Penguin Co Ltd understands that your privacy is important to you and that you care about how your Personal Data is used and shared online. We respect and value the privacy of everyone who visits this website: www.theefficientpenguin.co.uk ("Our Site") and will only collect and use Personal Data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy & Cookies Policy carefully and ensure that you understand it. It explains how We handle your Personal Data.

1. Definition and Interpretation

In this Policy the following terms shall have the following meanings:

"Cookie"	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 12, below;
"Cookie Law"	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
"Data Protection Legislation"	means all applicable legislation in force from time to time in the United Kingdom applicable to data protection and privacy including, but not limited to, the UK GDPR; the Data Protection Act 2018 (and regulations made thereunder); the Data (Use and Access) Act 2025; and the Privacy and Electronic Communications Regulations 2003 as amended;
"Personal Data"	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means Personal Data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the Data Protection Legislation; and
"We/Us/Our"	means The Efficient Penguin Co Ltd a company registered in England under company number 16804024 with a registered office address of 3rd Floor Paternoster House, 65 St. Paul's Churchyard, London, England, EC4M 8AB

2. Information About Us

Our Site www.theefficientpenguin.co.uk is owned and/or operated by Us.

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our services or products, the use of Our Site and any Personal Data We collect electronically and through Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

4. Your Rights

- a. As a data subject, you have the following rights under the Data Protection Legislation, which this Policy and Our use of Personal Data have been designed to uphold:
 - i. The right to be informed about Our collection and use of Personal Data;
 - ii. The right of access to the Personal Data We hold about you (see section 12);
 - iii. The right to rectification if any Personal Data We hold about you is inaccurate or incomplete (please contact Us using the details in section 14);
 - iv. The right to be forgotten – i.e., the right to ask Us to delete any Personal Data We hold about you (We only hold your Personal Data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 14);
 - v. The right to restrict (i.e., prevent) the processing of your Personal Data;
 - vi. The right to data portability (obtaining a copy of your Personal Data to re-use with another service or organisation);

- vii. The right to object to Us using your Personal Data for particular purposes; and
 - viii. Rights with respect to automated decision making and profiling.
- b. If you have any concerns about how We collect or use your Personal Data, We encourage you to contact Us in the first instance using the details in section 14 so that We can try to resolve the issue. We aim to respond to all complaints within 30 days. Where your concern is complex or requires more time, We will let you know and keep you updated on progress. If you are not satisfied with Our response, or if you would prefer not to speak to Us first, you can contact the UK's data protection authority: Information Commissioner's Office (ICO) www.ico.org.uk
- c. For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

5. What Data Do We Collect?

Depending upon your use of Our Site, Our products and services and any other electronic communication, We may collect some or all of the following personal and non-Personal Data (please also see section 13 on Our use of Cookies and similar technologies):

- a. Name;
- b. Email address; and
- c. Business name.

6. How Do We Use Your Data?

- a. All Personal Data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the Data Protection Legislation at all times. For more details on security see section 7, below.
- b. Our use of your Personal Data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your Personal Data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:
- i. Providing and managing your access to Our Sites;
 - ii. Personalising and tailoring your experience on Our Sites;
 - iii. Supplying Our services and products to you (please note that We require your Personal Data in order to enter into a contract with you);
 - iv. Personalising and tailoring Our services and products for you;
 - v. Replying to emails from you;
 - vi. Market research; and
 - vii. Analysing your use of Our Sites to enable Us to continually improve Our Sites and your user experience; and
 - viii. Where you have separately consented for marketing purposes or to access any of our free downloadable products.
- c. You have the right to withdraw your consent to Us using your Personal Data at any time, and to request that We delete it.
- d. We do not keep your Personal Data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):
- i. We will retain your contact details for as long as We contract with you and for 24 months thereafter, with the exception of financial information as detailed in iv. below;
 - ii. We will retain your contact details for 12 months if you have enquired about our services but not contracted with Us. Thereafter, they will be deleted;
 - iii. If you sign up to Our mailing list, We will retain your personal data for as long as you consent to receive emails from Us. You can unsubscribe at any time and We will remove you from Our mailing list and thereafter We will delete your details.
 - iv. We will retain your financial information for as long as We contract with you and, thereafter, for the permitted period of time required by law which is currently 6 years.

7. How and Where Do We Store Your Data?

- a. We only keep your Personal Data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.
- b. We will store some of your Personal Data in the UK. This means that it will be fully protected under the UK's Data Protection Legislation.
- c. We will store some of your Personal Data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your Personal Data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfers of Personal Data to the EEA from the UK are permitted without additional safeguards.
- d. We may store some or all of your Personal Data in countries outside of the UK and EEA. These are known as "third countries". When We do, We ensure that appropriate safeguards are in place to protect your data. These safeguards include ensuring that the level of protection in the destination country is not materially lower than that required under the Data Protection Legislation.
- e. We use the following third-party software and some of your data may be stored on their servers:
 - i. Hubsy; and
 - ii. Microsoft Outlook;
- f. Steps We take to secure and protect your data include:
 - i. All devices and computers that we store your data on are password protected;
 - ii. All devices and computers that we store your data have anti-virus software and are constantly updated to the most recent operating system; and
 - iii. We only store your data on computers and devices owned by Us. We also use Contractors who may store Our data on their computers, servers and any such cloud storage they may access. We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.

8. Do We Share Your Data?

- a. We may sometimes contract with third parties to supply products and services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.
- b. We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.
- c. We may sometimes use third party data processors that are located outside of the United Kingdom and European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Where We transfer any Personal Data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK under the Data Protection Legislation including:
 - i. Using Standard Contractual Clauses "SCCs" as a mechanism to safely process data outside of the UK and EEA to third countries which have not been granted adequacy; or
 - ii. Is a Country that has been granted adequacy which confirms its data protection legislation is adequate to safeguard data processing.
- d. In certain circumstances, We may be legally required to share certain data held by Us, which may include your Personal Data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

9. What Happens If Our Business Changes Hands?

- a. We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any Personal Data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy & Cookies Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

- b. In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.

10. How Can You Control Your Data?

In addition to your rights under the Data Protection Legislation, set out in section 4, when you submit Personal Data via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our site of your data for direct marketing purposes (including the ability to opt-out if receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details).

11. Your Right to Withhold Information

- a. You may access Our Site without providing any data at all.
- b. You may restrict Our use of Cookies. For more information, see section 13.

12. How Can You Access Your Data?

You have the right to request a copy of any of your Personal Data that We hold (where such data is held). Under the Data Protection Legislation, no fee is payable, We are required to reply to you within one month, and we will provide any and all information in response to your request free of charge, provided the request is reasonable. If We require clarification to help Us locate the information you are seeking, We may pause the one-month response period until We receive that clarification. We will also carry out a search that is reasonable and proportionate based on the scope and nature of your request. Please contact us for more details using the contact information set out in section 14.

COOKIES POLICY

13. Our Use Of Cookies

- a. Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and Personal Data is protected and respected at all times.
- b. All Cookies used by and on Our Site are used in accordance with current Cookie Law. We may use some or all of the following types of Cookie:

- i. **Strictly Necessary Cookies**

- A Cookie falls into this category if it is essential to the operation of Our Site, supporting functions such as logging in, your shopping basket, and payment transactions.

- ii. **Analytics Cookies**

- It is important for us to understand how you use Our Site, for example, how efficiently you navigate around it and which features you interact with: Where permitted by law, We may use certain analytics cookies that help Us gather this information without requiring your consent. These cookies are used solely to improve the performance and usability of Our Site and do not collect information that identifies you personally. Where analytics cookies are used for any other purpose or involve tracking, We will always request your consent.

- iii. **Functionality Cookies**

- Functionality Cookies enable Us to provide additional functions to you on Our Site such as personalisation and remembering your saved preferences. Some functionality Cookies may also be strictly necessary Cookies, but not all necessarily fall into that category.

- iv. **Targeting Cookies**

- It is important for Us to know when and how often you visit Our Site, and which parts of it you have used (including which pages you have visited and which links you have visited). As with analytics Cookies, this information helps us to better understand you and, in turn, to make Our Site and advertising more relevant to your interests.

- v. **Persistent Cookies**

- Any of the above types of Cookie may be a persistent Cookie. Persistent Cookies are those which remain on your computer or device for a predetermined period and are activated each time you visit Our Site.

- vi. **Session Cookies**

- Any of the above types of Cookie may be a session Cookie. Session Cookies are temporary and only

remain on your computer or device from the point at which you visit Our Site until you close your browser. Session Cookies are deleted when you close your browser.

- b. Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below in section 14.d, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.
- c. The following first, third party and analytics Cookies may be placed on your computer or device:

Name of Cookie	Purpose	Type
msgsndr_id	track visitors, manage marketing funnels, split test pages, and identify user contact info for analytics to enable personalised content and understanding user behaviour	Persistent
ga*	Google Analytics sets this cookie to store and count page views.	Analytics
_ga	The _ga cookie, installed by Google Analytics, calculates visitor, session and campaign data and also keeps track of site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitors.	Analytics

- d. In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third-party cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- e. You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.
- f. It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

14. Contacting Us

If you have any questions about Our Site or this Privacy & Cookies Policy, please contact Us by email at Hayley@theefficientpenguin.co.uk or by post 3rd Floor Paternoster House, 65 St. Paul's Churchyard, London, England, EC4M 8AB Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 11, above).

15. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site. This policy was last updated on **5th January 2026**.