

**Alexandra Pilkington T/A Sorted by Alex**

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## 1. IMPORTANT INFORMATION & WHO WE ARE

- 1.1. This Privacy Notice (the “Privacy Notice”) explains how Alexandra Pilkington trading as Sorted by Alex (“Sorted by Alex”, “we”, “us”, “our”) collects, uses, discloses and protects personal data in connection with our business, website, enquiries, client relationships, supplier relationships, contractor / associate relationships and related services.
- 1.2. We are committed to protecting personal data in accordance with the UK General Data Protection Regulation, the Data Protection Act 2018 and other applicable data protection laws (the “Data Protection Laws”).
- 1.3. This Privacy Notice applies to personal data collected or otherwise processed by us in connection with our business and services, including where you:
  - visit or use our website;
  - contact us by email, telephone, website enquiry form or otherwise;
  - make an enquiry about our services;
  - become a client or act on behalf of a client;
  - supply goods or services to us or contact us as a business contact;
  - work with us as a contractor, associate or other service provider;
  - provide personal data to us in connection with the services we provide; or
  - otherwise interact with us in a business or professional context.
- 1.4. Where we process personal data on behalf of a client as a processor, this Privacy Notice relates only to personal data processing for which we are responsible as controller, unless stated otherwise.
- 1.5. Where you are an individual whose personal data we handle solely on behalf of one of our clients, that client will usually be the controller responsible for deciding how and why your personal data is processed. In those cases, you should also read that client’s own privacy information.
- 1.6. If you have any questions about this Privacy Notice or wish to exercise any of your legal rights, please contact us using the details in section 14.

## 2. WHOSE PERSONAL DATA WE MAY PROCESS

- 2.1. We may process personal data relating to the following categories of people, where relevant:
  - website users;
  - prospective clients and people making enquiries;
  - clients and client contacts;
  - suppliers and business contacts;
  - contractors, associates and other service providers; and

- other individuals whose personal data is contained in information, communications or records provided to us in connection with our services.

2.2. We do not knowingly collect personal data relating to children as part of our usual business activities.

### 3. THE TYPES OF PERSONAL DATA WE MAY USE

3.1. Personal data means any information about an individual from which that person can be identified, directly or indirectly.

3.2. Depending on the nature of our relationship with you and the services involved, we may collect, use, store, disclose or otherwise process the following categories of personal data, where relevant:

- **Identity Data:** such as your name, title and job role;
- **Contact Data:** such as your email address, telephone number, correspondence address and other contact details;
- **Business Data:** such as your business name, company details, role, service requirements, diary information, business preferences and information relevant to the services;
- **Payment and Financial Data:** such as bank transfer details, payment references, invoice details and payment status information;
- **Communications and Enquiry Data:** such as emails, messages, call notes, meeting notes, instructions, requests, feedback, complaints and related correspondence;
- **Technical Data:** such as IP address, browser type, device-related information and other technical information generated through use of our website, email systems or related platforms;
- **Client Services Data:** such as information contained in client emails, diaries, records, documents, systems or communications to which we are given access in the course of providing services; and
- **Contractor / Associate Data:** such as contract details, onboarding records, invoices, time records, payment records and performance or engagement records.

3.3. We do not intentionally seek to collect special category personal data or criminal offence data as part of our usual services, but such data may occasionally be included in materials or communications provided to us by clients or others. Where this occurs, we will handle it in accordance with applicable Data Protection Laws and any applicable contractual arrangements.

### 4. HOW IS YOUR PERSONAL DATA COLLECTED?

4.1. We may collect personal data from and about you in the following ways:

- **Directly from you.** When you contact us, make an enquiry, instruct us, supply services to us, work with us or otherwise communicate with us. This includes data submitted through our website, email systems and general business correspondence.
- **Through our own records.** From business records, invoices, payment records, contracts and related administrative records.
- **From third parties connected with the services.** For example, from client representatives, contractors, associates, professional advisers or service providers, where appropriate.
- **From publicly available sources.** For example, from websites, LinkedIn or other professional or business sources, where relevant to our dealings with you.

- **From systems and providers we use to run our business.** For example, from our website host, email provider and other business systems.
- 4.2. At the date of this Privacy Notice, the main systems / providers we currently use include Ionos for website hosting and email, together with bank transfer / banking arrangements for payments, and any additional providers we use from time to time.

### 5. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

- 5.1. We will only process personal data where we have a lawful basis under applicable Data Protection Laws.
- 5.2. The main lawful bases on which we may rely are:
- **Contract:** where processing is necessary to take steps before entering into a contract with you, to perform a contract with you, or to deliver services;
  - **Legitimate Interests:** where processing is necessary for our legitimate business interests and your interests, rights and freedoms do not override those interests;
  - **Legal Obligation:** where processing is necessary for us to comply with legal, regulatory, tax, accounting or other legal obligations; and
  - **Consent:** where we have asked for and obtained your consent for a specific activity, where required.
- 5.3. Our legitimate interests may include:
- responding to enquiries and developing business relationships;
  - providing, managing and improving our services;
  - communicating with clients, suppliers, contractors, associates and business contacts;
  - maintaining business records, contracts, invoices and payment records;
  - protecting the security and integrity of our systems, website and business operations;
  - managing contractor / associate relationships and service delivery;
  - obtaining professional support and advice; and
  - establishing, exercising or defending legal claims.
- 5.4. Where we rely on legitimate interests, you may object to that processing in certain circumstances. We will consider any objection in accordance with Data Protection Laws.
- 5.5. We have considered the balance between our legitimate interests and your rights and freedoms where relying on legitimate interests.

### 6. HOW WE USE YOUR PERSONAL DATA

- 6.1. We will only use personal data for the purposes for which it was collected, or for other compatible purposes permitted by law.
- 6.2. The table below sets out common examples of how we may use personal data in connection with our business and services.

Purpose / Use	Type of Data	Lawful Basis	Retention Period
To respond to enquiries and discuss potential services	Identity Data, Contact Data, Business Data, Communications and Enquiry Data	Legitimate Interests; Contract (where pre-contract steps are requested)	Usually 12 to 24 months from the last meaningful contact, unless a longer period is reasonably necessary
To onboard clients and deliver services	Identity Data, Contact Data, Business Data, Communications and Enquiry Data, Client Services Data	Contract; Legitimate Interests	Usually for the duration of the client relationship and up to 6 years afterwards, unless longer retention is reasonably required
To communicate with clients and manage ongoing service delivery, including administrative support and access to relevant systems, emails, diaries and records	Identity Data, Contact Data, Business Data, Communications and Enquiry Data, Client Services Data	Contract; Legitimate Interests	Usually for the duration of the client relationship and up to 6 years afterwards, unless longer retention is reasonably required
To manage suppliers, business contacts, contractors and associates	Identity Data, Contact Data, Business Data, Payment and Financial Data, Communications and Enquiry Data, Contractor / Associate Data	Contract; Legitimate Interests; Legal Obligation	Usually for the duration of the relationship and up to 6 years afterwards, unless longer retention is reasonably required
To issue, receive and manage invoices, payments and related accounting records	Identity Data, Contact Data, Payment and Financial Data, Communications and Enquiry Data	Contract; Legal Obligation; Legitimate Interests	Usually up to 6 years from the end of the relevant financial / accounting period, or longer where required by law
To maintain business administration, records, internal governance and evidence of instructions / communications	Identity Data, Contact Data, Business Data, Communications and Enquiry Data, Contractor / Associate Data	Legitimate Interests; Legal Obligation	For as long as reasonably necessary for the relevant purpose and usually up to 6 years after the relevant relationship ends
To protect our business, website, systems and information security	Technical Data, Identity Data, Contact Data, Communications and Enquiry Data	Legitimate Interests; Legal Obligation (where applicable)	For as long as reasonably necessary for security, compliance and record-keeping purposes
To obtain professional advice or deal with disputes, complaints or legal issues	Any categories relevant to the issue concerned	Legitimate Interests; Legal Obligation	For as long as reasonably necessary to deal with the issue and any applicable limitation period

- 6.3. Where we process personal data on behalf of a client as processor, the relevant client is responsible for its own lawful basis and transparency obligations as controller.

### 7. PERSONAL DATA WE PROCESS ON BEHALF OF CLIENTS

- 7.1. In the course of providing services, we may receive access to personal data contained in client emails, diaries, documents, systems, contact databases, internal records and business communications.
- 7.2. Where we process such personal data solely on behalf of a client and in accordance with that client's instructions, the client will usually be the controller and we will usually be the processor.
- 7.3. In those circumstances, the relevant client is generally responsible for deciding the lawful basis for the processing and for providing any privacy information required to the relevant individuals.
- 7.4. If you contact us about personal data that we process solely on behalf of one of our clients, we may need to refer your request to that client or otherwise deal with it in accordance with that client's instructions and any applicable contractual or legal obligations.

### 8. DISCLOSURES OF YOUR PERSONAL DATA

- 8.1. We may share relevant personal data with:
- IT, hosting, email, storage and other system providers, including Ionos and any replacement or additional providers used from time to time;
  - professional advisers, such as accountants, legal advisers, insurers or other specialist advisers, where reasonably required;
  - banks, payment service providers or other financial institutions, where required for payment processing or financial administration;
  - contractors, associates or service providers engaged by us where access is necessary for the relevant services and appropriate obligations are in place;
  - regulators, authorities, courts, tribunals, law enforcement bodies or other public authorities, where legally required or permitted;
  - our clients, where relevant to the services or to the handling of requests, complaints or issues; and
  - any other third party where you have asked us to share information or where sharing is required or permitted by law.
- 8.2. We will only share personal data where we have a lawful basis to do so and where the sharing is necessary and proportionate for the relevant purpose.
- 8.3. We do not sell personal data.

### 9. INTERNATIONAL TRANSFERS

- 9.1. Some personal data may be processed through third-party systems, platforms or service providers.
- 9.2. Although we are UK-based and do not ordinarily intend to transfer personal data outside the United Kingdom, some providers or systems we use now or in the future may process or store personal data outside the United Kingdom.
- 9.3. Where personal data is transferred outside the United Kingdom, we will seek to ensure that appropriate safeguards are in place in accordance with applicable Data Protection Laws, where required.

- 9.4. Further details of relevant safeguards may be available on request, subject to confidentiality, security and legal limitations.

### 10. DATA SECURITY

- 10.1. We take reasonable steps to protect personal data against unauthorised access, loss, misuse, alteration or disclosure.
- 10.2. Our measures may include:
- restricting access to personal data to persons with a genuine need to know;
  - using secure email, account access, storage and document handling measures;
  - password protection and appropriate access controls;
  - secure systems and confidentiality obligations for those handling personal data on our behalf; and
  - reviewing our processes and arrangements periodically.
- 10.3. Where we use third-party systems or service providers, we will take reasonable steps to ensure that appropriate data protection arrangements are in place.

### 11. DATA RETENTION

- 11.1. We retain personal data only for as long as reasonably necessary for the purposes set out in this Privacy Notice, or to meet legal, regulatory, accounting, compliance, dispute management or legitimate business requirements.
- 11.2. We determine retention periods by considering:
- the nature and sensitivity of the data;
  - the purpose of the processing;
  - whether the data remains necessary for that purpose;
  - the nature of the relevant relationship or engagement;
  - legal, accounting or compliance requirements; and
  - the potential risk of harm from unauthorised use or disclosure.
- 11.3. Our current retention approach is generally as follows:
- enquiry data: usually 12 to 24 months from the last meaningful contact;
  - client data: usually for the duration of the client relationship and up to 6 years afterwards;
  - supplier, contractor and associate data: usually for the duration of the relationship and up to 6 years afterwards;
  - financial and accounting records: usually up to 6 years from the end of the relevant financial / accounting period, or longer where legally required; and
  - technical or security-related data: for as long as reasonably necessary for security, troubleshooting, compliance and record-keeping purposes.
- 11.4. We may retain anonymised data indefinitely where it no longer identifies any individual.

## 12. AUTOMATED DECISION-MAKING

- 12.1. We do not currently carry out automated decision-making or profiling that produces legal or similarly significant effects.

## 13. YOUR LEGAL RIGHTS

- 13.1. Under the UK GDPR and applicable data protection laws, you have a number of rights in relation to your personal data, subject to certain conditions and legal exemptions. These may include the right to:
- **Withdraw consent at any time where we rely on consent to process your personal data.** This will not affect the lawfulness of processing carried out before withdrawal. If you withdraw consent, we may be unable to provide certain products or services; we will advise you if this applies at the time (Article 7(3)). See the table in Section 6 for details of when we rely on your consent as the legal basis for using your data.
  - **Request access to the personal data we hold about you (commonly known as a “subject access request”).** This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it (Article 15).
  - **Request correction of any inaccurate or incomplete data we hold about you.** This allows you to have any incomplete or inaccurate data corrected, although we may need to verify the accuracy of new data you provide (Article 16).
  - **Request erasure of your personal data in certain circumstances (“the right to be forgotten”).** This allows you to ask us to delete or remove personal data where:
    - you have successfully exercised your right to object to processing (see below);
    - there is no lawful reason for us to continue processing it;
    - we may have processed your information unlawfully; or
    - we are required to erase your personal data to comply with legal obligations.

Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request (Article 17).

- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in one of the following scenarios (Article 18):
  - If you want us to establish the data’s accuracy;
  - Where our use of the data is unlawful but you do not want us to erase it;
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party (portability).** We will provide your data in a structured, commonly used and machine-readable format, where technically feasible. This right applies only to automated data you provided to us under consent or contract (Article 20).
- **Object to processing of your personal data.** You may object where we rely on legitimate interests (or those of a third party) as the lawful basis for processing, including profiling based on such interests. In some cases, we may demonstrate that we have compelling legitimate grounds to continue processing which override your objection (Article 21).

- **Not be subject to automated decision-making that produces legal or similarly significant effects.** We do not currently carry out automated decision-making or profiling (Article 22).
- **Complain to a supervisory authority if you believe we have breached data-protection law.**

In the UK, this is the Information Commissioner's Office (ICO) (Article 77).

- 13.2. These rights are not absolute and may not apply in all circumstances.
- 13.3. You will not usually have to pay a fee to exercise your rights. However, we may charge a reasonable fee or refuse to comply with a request if it is manifestly unfounded, repetitive or excessive.
- 13.4. We may need to request information from you to confirm your identity before responding to a request.
- 13.5. We aim to respond to legitimate requests within one calendar month, although this may be extended where legally permitted.

#### 14. CONTACT DETAILS & COMPLAINTS

- 14.1. If you have any questions about this Privacy Notice, the way we handle personal data, or if you would like to exercise any of your legal rights, please contact us using the details below:

**Entity:** *Alexandra Pilkington T/A Sorted by Alex*

**Email:** [alex@sortedbyalex.co.uk](mailto:alex@sortedbyalex.co.uk)

- 14.2. Sorted by Alex has not appointed a formal Data Protection Officer. All privacy and data protection enquiries should be sent to the contact details above.
- 14.3. You also have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection matters.
- 14.4. We would, however, appreciate the opportunity to address your concerns first and encourage you to contact us in the first instance.

#### 15. CHANGES TO THIS PRIVACY NOTICE

- 15.1. We may update this Privacy Notice from time to time to reflect changes in law or our processes. Where we make material changes, we will publish or provide the updated version with a revised effective date.
- 15.2. It is important that the personal data we hold about you is accurate and current. Please notify us if your contact details or other relevant information change.
- 15.3. The most current version of this Privacy Notice will be made available through our onboarding materials or provided on request.

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