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SHENBERG DATA LTD

Commercial coordination for data-related services

Privacy & Data Handling Notice

Effective and last updated: 11 November 2026

LEGAL ENTITY	SHENBERG DATA LTD
COMPANY NUMBER	SC892536
REGISTERED OFFICE	18/2 Royston Mains Street, Edinburgh, EH5 1LB, Scotland, United Kingdom
PRIMARY LAW	UK GDPR and Data Protection Act 2018, as amended
PRIVACY EMAIL	privacy@shenbergconsulting.com
SUPPORT EMAIL	support@shenbergconsulting.com

This notice explains how Shenberg Data Ltd ("Shenberg", "we", "us" or "our") handles personal information in connection with its website, business administration and its role as a commercial, contractual and financial intermediary for data-related services.

At a glance

OUR ROLE

Arrange services, coordinate suppliers, administer commercial relationships, support invoicing, reconciliation and payment flows.

OUR OWN DATA

Limited business contact, contracting, invoicing, payment, correspondence, compliance and website-security information.

CLIENT DATA BOUNDARY

No independent ownership, marketing-list creation, resale, rental, licensing or unrelated exploitation of underlying client personal data.

YOUR RIGHTS

Depending on the circumstances: access, correction, deletion, restriction, portability, objection, withdrawal of consent and complaint to the ICO.

1. Our role and scope

Shenberg arranges services, coordinates specialist suppliers, manages commercial relationships, administers contractual documentation, supports invoicing and reconciliation and coordinates payment flows. This notice concerns the personal information Shenberg processes for those activities.

For this notice, “client data” means underlying consumer, lead, campaign or other individual records involved in a client service. Client data is distinct from Shenberg’s limited business-administration information. The relevant client or other controller determines the authorised purposes and essential means of processing client data unless a separate written arrangement expressly assigns Shenberg a different legal role.

This notice does not replace a client’s, controller’s or specialist provider’s own privacy information for processing that they control.

2. Client data boundaries

Commercial or financial involvement does not give Shenberg ownership of client data or an independent right to exploit it. We do not use client data to build our own reusable marketing lists, contact individuals for Shenberg's own campaigns, create independent profiles, or sell, rent, license or otherwise commercialise client data for our own purposes.

We do not routinely request, inspect or retain client datasets. If limited access or temporary handling is technically necessary, it must be specifically authorised, proportionate to the contracted task and subject to applicable confidentiality, security and retention controls. Unrequested client datasets should not be sent to Shenberg.

Where Shenberg separately accepts a processor or service-provider role for client data, it acts only on documented instructions and under the applicable data-processing terms. The legal role follows the actual activity, not merely the commercial label used by the parties.

3. Business information we process directly

For Shenberg's own administration, we may process names, job titles, employer or business affiliation, business email addresses and telephone numbers, signatures, contracting information, supplier information, invoice and payment records, correspondence, compliance material, and records needed to establish, exercise or defend legal claims.

We generally obtain this information from the individual, their organisation, a commercial counterparty, an authorised representative, or records generated through our own business relationship. We do not request special-category information for ordinary commercial administration.

4. Why we use business information and our lawful bases

We use business information to assess and establish commercial relationships, arrange and administer services, communicate with clients and suppliers, manage contracts and service changes, reconcile invoices and payments, maintain business records, comply with law, secure our systems, prevent misuse and handle complaints or legal claims.

Depending on the purpose, the lawful basis may be performance of or steps connected with a contract, compliance with a legal obligation, legitimate interests in operating and protecting our business and relationships, or consent where the law requires it. Where legitimate interests are relied upon, we assess the purpose, necessity and impact on the individual before using that basis.

5. Website and technical information

When our website is accessed, hosting, security and infrastructure providers may process limited technical information such as IP address, browser and device information, timestamps, requested resources, diagnostic information and security logs. This information is used to deliver, protect and maintain the website and investigate misuse or technical faults.

If Shenberg introduces non-essential analytics, advertising technologies, marketing cookies or materially different website tracking, appropriate information and consent or preference controls will be implemented before use where required by law.

6. Suppliers, service providers and counterparties

Shenberg may use technology, hosting, accounting, banking, payment, professional-advisory and administration providers. A supplier processing personal information on our behalf must act for the authorised purpose and under appropriate confidentiality, security and contractual controls.

Where we coordinate a specialist provider for a client service, the applicable client, provider and service documents determine the processing roles. A provider is not given an independent right to market, profile, pool, resell or reuse client data merely because it supports a Shenberg-coordinated service.

Shenberg may coordinate services involving data validation, hygiene, identity verification, audience support, secure transfer, escrow, API-based workflows or campaign operations. The description of a service does not itself change which party is controller, processor or independent recipient.

7. Disclosures

We may disclose limited business information to authorised staff, service providers, banks and payment providers, accountants, auditors, lawyers, insurers, commercial counterparties and public authorities where necessary for the relevant purpose or required by law. We limit disclosures to information reasonably required for that purpose.

In a genuine corporate transaction, relevant information may be provided to prospective buyers, investors, lenders or advisers under appropriate confidentiality and due-diligence controls.

8. International transfers

Clients, suppliers and service providers may operate internationally, so personal information may be accessed or processed outside the United Kingdom. Where Shenberg initiates a restricted transfer under the UK GDPR, we use a permitted transfer mechanism, such as UK adequacy regulations or appropriate safeguards including the UK International Data Transfer Agreement or UK Addendum where suitable, together with supplementary measures where required.

Where Shenberg acts only on documented instructions for a client, transfer responsibilities are allocated in the applicable contract and service arrangement. Individuals may request information about the relevant transfer safeguards where they apply to Shenberg's own processing.

9. Retention

We retain personal information only for as long as needed for the purpose for which it was collected and for applicable accounting, tax, contractual, compliance, complaint, security and legal-claim periods. Retention depends on the record type, statutory requirements, contractual obligations and whether a dispute, investigation or legal hold is active.

When information is no longer required, it is deleted, anonymised or securely isolated. Backup copies awaiting normal expiry remain protected and are not used for unrelated purposes.

10. Security and incidents

Shenberg applies proportionate technical and organisational measures appropriate to the information and risk. Measures may include access restrictions, confidentiality requirements, secure authentication, protected systems, supplier due diligence, logging, secure transfer practices and incident-management procedures.

Suspected loss, unauthorised access or disclosure is investigated and contained. Clients, authorities and affected individuals are notified where required by applicable law or contract. No method of storage or transmission can be guaranteed completely secure.

11. Your rights and complaints

Depending on the circumstances and applicable law, you may have rights to request access, correction, erasure, restriction or portability of your personal information, object to certain processing, and withdraw consent where processing is based on consent. Withdrawal does not affect processing lawfully carried out before withdrawal.

Requests concerning Shenberg's own processing can be sent to privacy@shenbergconsulting.com or in writing to the registered office stated on page 1. General enquiries may be sent to support@shenbergconsulting.com. We may take proportionate steps to verify identity or authority before acting on a request. For underlying client data, the relevant client or controller will usually be the appropriate first contact; Shenberg will assist where required by its role and applicable law.

You may complain to the Information Commissioner's Office (ICO) if you believe your data-protection rights have been infringed.

12. Data Protection Officer

Shenberg has not appointed a Data Protection Officer. Based on its current assessment of the nature, scope, context and purposes of its processing, Shenberg does not consider that the mandatory designation criteria under Article 37 of the UK GDPR presently apply. This assessment will be reviewed if our activities materially change.

13. Children

Our website and intermediary services are directed to businesses and professional users. We do not knowingly seek personal information from children through this website.

14. Changes to this notice

We may update this notice to reflect changes in our activities, service providers, security practices or legal requirements. Material changes do not retrospectively authorise incompatible uses of personal information. The date on page 1 identifies the current version.

Contact for Shenberg privacy matters

CONTACT	Privacy: privacy@shenbergconsulting.com General support: support@shenbergconsulting.com SHENBERG DATA LTD 18/2 Royston Mains Street Edinburgh EH5 1LB Scotland, United Kingdom