

# **Privacy Policy**

Last updated: November 2025

Northern Leaf plc ("we", "us", "our") is committed to protecting and respecting your privacy. This Privacy Policy explains how we collect, use, store and protect your personal data when you visit our website or interact with us.

This policy is intended to comply with the Data Protection (Jersey) Law 2018 and aligns with UK GDPR principles.

#### 1. About Us

Data Controller: Northern Leaf plc

13 Castle Street, St Helier, Jersey, JE1 1ES

Company No: 128967

Email: enquiries@northern-leaf.com Telephone: +44 (0)1534 660420

If you have any questions about this policy or how your data is handled, please contact us using the above details.

#### 2. Personal Data We Collect

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

- a) Information you provide directly
  - Name
  - Email address
  - Telephone number
  - Postal address
  - Company name
  - Any information provided via enquiry forms or email correspondence
- b) Information collected automatically

When you visit our website, we may automatically collect: - IP address - Browser type and version - Operating system - Pages visited and time spent - Referring website - Device identifiers

This information is collected using cookies and analytics tools.

c) Information from third parties

We may receive limited information from: - Professional advisors - Business partners - Publicly available sources

#### 3. How We Use Your Personal Data

We process your data for the following purposes:

- Responding to enquiries or communications
- Providing requested information or services
- Managing business relationships
- Improving website functionality and user experience



- Compliance with legal obligations
- Marketing communications (where consent has been provided)

# 4. Lawful Basis for Processing

Under the Data Protection (Jersey) Law 2018, we rely on the following lawful bases:

- Consent where you have given clear permission
- Contractual necessity where processing is necessary to fulfil a contract
- Legal obligation where required by law
- **Legitimate interests** where processing supports our business operations and does not override your rights

### 5. Marketing Communications

Northern Leaf plc does not send marketing or promotional communications.

We do not use personal data for direct marketing purposes, newsletters, promotional campaigns or unsolicited communications. Any personal data collected via the website is used solely for legitimate operational purposes, including responding to enquiries, managing business relationships and complying with legal or regulatory obligations.

If our approach to marketing changes in the future, this policy will be updated and appropriate consent mechanisms will be introduced where required.

# 6. Cookies & Tracking Technologies

We use cookies to improve functionality and analyse performance.

You will be presented with a cookie consent banner on your first visit allowing you to: - Accept all cookies - Reject non-essential cookies - Manage preferences

Types of cookies used: - Strictly necessary cookies - Performance analytics cookies - Functional cookies

You may control cookies via your browser settings at any time.

### 7. Data Sharing

We may share personal data with:

- IT service providers
- Website hosting providers
- Professional advisors (legal, accounting)
- Regulatory bodies where legally required

We do not sell or trade personal data.

# 8. International Transfers

Where data is transferred outside Jersey or the UK, we ensure appropriate safeguards are in place, including contractual clauses and equivalent protections.



#### 9. Data Retention

We retain personal data only for as long as necessary, including: - Enquiry records: up to 24 months - Business communications: up to 7 years - Marketing data: until consent is withdrawn

# 10. Your Rights

You have the right to:

- Access your personal data
- Rectify inaccurate data
- Erase your data
- Restrict processing
- Object to processing
- Withdraw consent at any time
- Lodge a complaint with the Jersey Office of the Information Commissioner (JOIC)

JOIC Contact: https://oic.je

### 11. Data Security

We take appropriate technical and organisational measures to protect your personal data from unauthorised access, disclosure, alteration or destruction.

### 12. Data Breaches

In the event of a data breach presenting risk to individuals, we will notify the JOIC and affected individuals where legally required.

### 13. Links to Third-Party Websites

Our website may contain links to external sites. We are not responsible for their privacy practices and recommend reviewing their policies.

# 14. Changes to This Policy

We may update this policy periodically. The latest version will always be available on our website.

### 15. Contact Us

For any data protection enquiries, please contact:

Email: enquiries@northern-leaf.com Telephone: +44 (0)1534 660420

Address: 13 Castle Street, St Helier, Jersey, JE1 1ES