

Privacy Notice

Barbourne Brook Limited — Consultancy Services

Version 1.0 (new) | Updated: 17 August 2026

This notice supports clause 18 of the Terms & Conditions of Business for the Supply of Consultancy Services.

1. Who this notice is for

Barbourne Brook Limited (company number 09169729, registered office Hop Merchants, 21 Sansome Street, Worcester WR1 1UH) ("Barbourne Brook", "we", "us") provides customs consultancy services, including Reclaim Services, to businesses ("the Company"). This notice explains how we process personal data about individuals in connection with the Terms & Conditions of Business for the Supply of Consultancy Services ("the Conditions"). It applies to:

- Individuals who are the Company's directors, employees or other contacts, with whom we correspond in the course of providing the Services.
- Individuals whose personal data appears within HMRC reports or other data and materials the Company supplies to us in connection with the Services, for example a declarant's name recorded on a customs declaration.

This notice does not cover our own employees, or personal data processed in connection with CAT360, our software platform, which has its own privacy policy.

2. Our role

Where the Company supplies us with data containing personal data as part of the Services, including HMRC reports, the Company is the Controller of that data and we act as Processor, in accordance with the Barbourne Brook Data Protection Policy (Consultancy Services). Where we process the personal data of the Company's own contacts, for example when arranging or delivering the Services, we act as Controller in our own right, and this notice is given under Articles 13 and 14 of the UK GDPR in that respect.

3. Personal data we process

Depending on the nature of the Services, this may include:

- Contact details: name, job title, work email address and phone number of the Company's directors, employees or other nominated contacts.
- Correspondence: records of our communications with the Company's contacts in connection with the Services.
- Data within HMRC reports and Company Data: personal data that may appear incidentally within customs declarations, records or other materials supplied by the Company, such as a declarant's or consignee's name.
- Invoicing and payment details, where relevant to billing for the Services.

4. How we collect this information

We collect contact details directly from the Company and its nominated contacts. We collect data contained within HMRC reports and other data or materials as supplied by the Company for the purposes of the Services, including Reclaim Services.

5. Why we use this information and our lawful basis

Where we act as Controller, we rely on:

- Contractual necessity: to communicate with the Company's contacts and perform the Services under the Contract.
- Legitimate interests: to maintain business records, manage our relationship with the Company, and for invoicing and credit control, in a way that does not override the individual's own rights.
- Legal obligation: where required, for example to comply with tax, accounting or regulatory requirements.

Where personal data appears within HMRC reports or other Company Data, we process it under the Company's instructions as Processor, on the lawful basis the Company itself has established as Controller.

6. Who we share this information with

We may share personal data with:

- HMRC, where necessary to perform Reclaim Services or other Services on the Company's instructions.
- Our own professional advisers, such as our accountants, auditors or legal advisers, where necessary.
- IT and other service providers who support our systems, subject to appropriate confidentiality and data protection terms.
- Regulators or other authorities, where required by law.

We do not sell personal data, and we do not share it with any other third party for their own marketing purposes.

7. International transfers

Where we transfer personal data outside the United Kingdom, for example to a service provider, we ensure appropriate safeguards are in place, such as an adequacy decision, Standard Contractual Clauses, or the UK International Data Transfer Addendum.

8. Retention

We retain personal data for the duration of the Services and for such further period as is necessary to meet our own legal, accounting, tax and regulatory obligations, including in respect of any ongoing Reclaim Services or related HMRC correspondence. We securely delete or anonymise personal data once it is no longer required.

9. Your rights

Subject to certain conditions and exemptions, you have the right to: request access to your personal data; request that we correct any inaccurate or incomplete data; request that we delete or restrict processing of your data; object to our processing of your data; and request that we transfer your data to another organisation. Where personal data was supplied to us by the Company as Controller, some of these rights may need to be exercised with the Company directly, and we will assist the Company in responding to such requests.

10. How this notice relates to our other policies

This notice explains our data practices to individuals. It works alongside, but is a separate document from, the Barbourne Brook Data Protection Policy (Consultancy Services),

which sets out our contractual obligations as Processor towards the Company under clause 18 of the Conditions.

11. Changes to this notice

We may update this notice from time to time to reflect changes in our practices or the law.

12. Contact us and complaints

If you have questions about this notice or how we handle personal data, contact Sarah O'Neill, Data Representative — sarah@barbournebrook.co.uk, Barbourne Brook Limited (company number 09169729, registered office Hop Merchants, 21 Sansome Street, Worcester WR1 1UH).

You also have the right to complain to the Information Commissioner's Office (ICO) at ico.org.uk.

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