PRIVACY NOTICE

Hut22 Ltd

Last Updated: November 2026

1. Introduction.

Hut22 Ltd ("we", "us", "our") is committed to protecting your personal data and respecting your privacy. This privacy notice explains how we collect, use, and protect your personal information in accordance with UK data protection law, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Hut22 Ltd is a UK-registered limited company providing sustainability consultancy, carbon management training, carbon accounting software (licences to the Carbon+Alt+Delete platform), and facilitation services.

2. Who we are.

Data Controller: **Hut22 Ltd**

Registered Office: **2 Ashley Drive, Bussage, Stroud, Glos. GL6 8BY**

Company Number: **13991795**

Website: **www.hut22.co.uk**

Contact: **info@hut22.co.uk**

If you have any questions about this privacy notice or how we handle your personal data, please contact us using the details above.

3. What personal data we collect.

We collect and process the following categories of personal data:

Contact Information: Names, email addresses, telephone numbers, job titles, and company/organisation details.

Financial Information: Billing details and purchase history. Online payments are processed through QuickBooks (Intuit); we do not store your full card details.

Organisational Information: Such as details of your organisation's energy consumption, Greenhouse Gas emissions, carbon reduction strategies, environmental impact data, energy costs, business strategies, organisational structure, information regarding services and products, and related operational information provided during, and necessary for the execution of, consultancy engagements.

Contract and Service Data: Information relating to contracts, service agreements, training attendance, and workshop participation.

Platform Account Data: If your organisation licenses the Carbon+Alt+Delete carbon accounting platform through us, your name, work email address, account details and information about how you use the platform.

Technical Data: IP addresses, browser type and device information collected when you visit our website.

4. How we collect your data.

We collect personal data:

- Directly from you when you contact us, engage our services, register for training, or attend workshops.
- Through our website when you complete forms, subscribe to updates, or browse our site.
- From your organisation when they engage us for consultancy or training services.
- From your organisation, when it sets you up as a user of a carbon accounting platform we supply, and from the platform itself as you use it.
- Through publicly available sources where relevant to our professional services.

5. How and why we use your data.

We use your personal data for the following purposes under these legal bases:

Contract Performance: To deliver sustainability consultancy, carbon management training, and facilitation services you or your organisation has contracted with us.

Legitimate Interests: To run our business, respond to enquiries, and maintain relationships with clients and business contacts; and to set up, administer and support your access to a carbon accounting platform your organisation has licensed from us.

Consent: We only send marketing emails if you have opted in. Every email includes an unsubscribe link, and we keep a record of when and how you gave consent. We also rely on consent for the functional cookies used by our website forms.

Legal Obligations: To comply with our legal and regulatory requirements, including tax and accounting obligations.

6. Where we act on behalf of your organisation.

When your organisation enters data into its own account on a carbon accounting platform we supply, or gives us personal data about its staff for consultancy work, such as business travel data, your organisation decides how that data is used and is responsible for it. We process that data on your organisation's behalf, under its instructions. Where the data is in the carbon accounting platform, the platform provider processes it as our sub-processor. Please refer to your organisation's privacy notice, and contact your organisation if you want to exercise your rights over that data.

7. Who we share your data with.

We share personal data only where necessary with:

- Payment Processors: Quickbooks software (by Intuit) application for accounting and payment processing.
- Cloud Service Providers: Microsoft for secure data storage (UK/EU data centres)
- Scheduling: Calendly, for booking calls and sessions.
- Website: Wix, for website hosting, chat and bookings.
- Website Forms: Boom Form, for the forms on our website.
- Email Marketing: MailerLite, for newsletters, automated emails and delivery of the Net Zero Gap Analysis.
- Online Workshops: Miro, for collaborative whiteboards.
- Software Platform Provider: Carbon+Alt+Delete (Belgium), which hosts and operates the carbon accounting platform on our behalf, using its own sub-processors, including Amazon Web Services.
- Professional Advisers: Accountants, lawyers, or consultants where necessary for business operations.
- Legal Requirements: Regulatory bodies, law enforcement, or other authorities where legally required.

We do not sell your personal data to third parties. All third-party service providers are required to maintain appropriate security measures and process data only as instructed by us.

8. International transfers.

Some of our service providers (including Calendly, Wix, Boom Form, MailerLite, Miro and Intuit (QuickBooks)) are based outside the UK or may process data outside it. Where this happens, we rely on UK adequacy regulations, the UK Extension to the EU-US Data Privacy Framework where the provider is certified, or the UK International Data Transfer Addendum, so that your data receives equivalent protection.

Platform data is hosted in the European Union (mainly Paris and Frankfurt, with user-experience tracking in Dublin). We rely on UK adequacy regulations for transfers to the EU. Some of the platform provider's sub-processors, used for user feedback and in-app support, are based in the United States.

9. How long we keep your data.

We retain personal data only for as long as necessary:

- Client and contract data, including training attendance: For the duration of our relationship plus 6 years to meet legal and tax obligations.
- Platform account data: For as long as your organisation's licence and your user access continue. When your organisation's licence ends, the platform provider returns the data within 30 days and deletes any remaining copies and backups within 90 days. Our own records of the licence are kept as for other client and contract data.

- Marketing data: Until you unsubscribe. We then keep your email address on a suppression list so that we do not contact you again. We remove contacts who have not engaged with our emails for 2 years.
- Financial records: 6 years in accordance with HMRC requirements

After these periods, we securely delete or anonymise your personal data.

10. Your rights.

Under UK data protection law, you have the right to:

- Access your personal data (subject access request).
- Rectify inaccurate or incomplete data.
- Erase your data in certain circumstances.
- Restrict processing in certain circumstances.
- Object to processing based on legitimate interests.
- Data portability (receive your data in a usable format).
- Withdraw consent where processing is based on consent.
- Lodge a complaint with the Information Commissioner's Office (ICO).

To exercise any of these rights, please contact us using the details in section 2. There is no charge. We will respond within one month, or within three months for complex requests, in which case we will tell you within the first month.

We do not make decisions about you based solely on automated processing.

11. Cookies.

Our website is hosted on Wix and uses essential cookies, which are needed for the site to work, and functional cookies for our forms, which we only set with your consent. We do not use analytics, advertising or tracking cookies.

You can change your choices at any time through our cookie banner, and you can also block or delete cookies through your browser settings. For more information, please see our Cookie Policy on our website.

12. Security.

We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, or misuse. This includes:

- Secure cloud storage with encryption
- Access controls and password protection
- Regular security reviews and updates
- Regular data protection training for the Director

13. Changes to this notice.

We may update this privacy notice from time to time. Any changes will be posted on our website with an updated revision date. Where changes are significant, we will notify you directly.

14. Complaints.

If you have concerns about how we process your personal data, you can make a complaint to us by emailing info@hut22.co.uk with “Data protection complaint” in the subject line. We will acknowledge your complaint within 30 days of receiving it, look into it without undue delay, keep you informed of progress, and tell you the outcome. You also have the right to lodge a complaint with the UK supervisory authority:

Information Commissioner's Office (ICO)

Wycliffe House, Water Lane

Wilmslow, Cheshire SK9 5AF

Telephone: 0303 123 1113

Website: www.ico.org.uk

This privacy notice was last updated on 2nd November 2026 and applies to all services provided by Hut22 Ltd.