

# Privacy Policy

**Last updated:** 10 April 2026

## 1. Data Controller

NovaXact is the trading name of Joanna Mierzynska. For the purposes of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, we are the Data Controller for personal data collected through this website.

Email: [contact@novaxact.co.uk](mailto:contact@novaxact.co.uk)

ICO Registration Number: **ZC155221**

## 2. Personal Data We Collect and Process

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

- **Identity and Contact Data:** name, email address, and company name when you fill out our contact forms or make an enquiry.
- **Technical and Usage Data:** IP address, browser type, operating system, and information about how you use our website, collected via cookies and similar technologies.
- **Client Project Data:** data provided to us by clients for analysis. In these cases, we act as a Data Processor under a separate Data Processing Agreement (DPA).

## 3. How We Use Your Data

Under the UK GDPR, we rely on the following lawful bases to process your data:

- **Performance of a Contract:** to provide data analysis and automation services that you request.
- **Legitimate Interests:** to respond to your enquiries, manage our business relationship, and improve our website and services.
- **Consent:** to send marketing communications, if you have opted in. You can withdraw your consent at any time.

## 4. Sharing Your Data and International Transfers

We do not sell your personal data.

We may share personal data with trusted third-party service providers that help us run our website, manage communications, and provide analytics services such as Amplitude. Some

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of these providers may process data outside the UK or the European Economic Area (EEA), including in the United States.

Where international transfers occur, we ensure appropriate safeguards are in place, such as Standard Contractual Clauses or the UK International Data Transfer Addendum, where applicable.

## 5. Data Retention

We only keep your personal data for as long as necessary for the purposes for which it was collected:

- **General Enquiries:** kept for up to 2 years from the date of last contact.
- **Client Project Data:** deleted within 30 days after project completion, unless otherwise agreed in the relevant DPA.
- **Financial and Tax Records:** kept for 6 years to comply with HMRC requirements.

## 6. Your Rights

Under UK data protection law, you have the following rights:

- the right of access.
- the right to rectification.
- the right to erasure.
- the right to restrict or object to processing.
- the right to data portability.
- the right to withdraw consent at any time, where consent is the lawful basis.

If you wish to exercise any of these rights, please contact us at [contact@novaxact.co.uk](mailto:contact@novaxact.co.uk). We will respond without undue delay and in any event within one month, unless an extension is permitted by law.

## 7. Cookies

Our website uses strictly necessary cookies for basic functionality and analytics cookies only if you give your consent through the cookie banner. For more information, please see our Cookie Policy.

## 8. Security

We take the security of your personal data seriously and use appropriate technical and organisational measures to protect it against unauthorised access, loss, misuse, or disclosure.

## 9. Complaints

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If you have concerns about how we handle your personal data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection.

Website: <https://ico.org.uk>

Helpline: 0303 123 1113