



Subject: Corporate Governance & Data Practices

Effective Date: 1/07/2026

Statutory Privacy Policy & Transparency Disclosure: A governing framework on how we collect, protect, and handle enterprise data with absolute operational integrity.

Who We Are

MIGASUTO (referred to as “we”, “us”, or “our” in this policy) is a provider of fractional CFO services to early-stage startups & SMEs.

Our contact details:

- **Business name:** MIGASUTO

- **Email:** info@migasuto.com

We do not have a Data Protection Officer (DPO). If you have any questions about this policy or how we handle your personal information, please contact us using the email address above.

What Personal Data We Collect

We collect and process the following categories of personal data about our clients, prospective clients, and website visitors:

Category	Examples
Identity Data	Name, job title, company name, director/owner information
Contact Data	Email address, telephone number, postal address
Financial Data	Bank account details, payment information, invoicing history
Engagement Data	Records of our services provided to you, correspondence (including complaints), meeting notes, and deliverables shared
Technical Data (website visitors)	IP address, browser type and version, time zone setting, operating system, and referral source (collected via analytics cookies)
Marketing Preferences	Your preferences for receiving marketing communications from us

We do not knowingly collect **special category data** (e.g., health information, racial or ethnic origin, political opinions, religious beliefs, trade union membership, genetic or biometric data, or sexual orientation).

How We Collect Your Personal Data

We collect personal data in the following ways:

- **Direct interactions:** You provide identity, contact, financial, and engagement data when you email us, complete a contact form on our website, sign an engagement letter, or communicate with us by phone or in person.
- **Third parties or publicly available sources:** We may receive identity and contact data from professional introducers, business partners, or your own colleagues (with your knowledge).
- **Automated technologies or interactions:** As you interact with our website, we may automatically collect technical data about your equipment, browsing actions, and patterns. We collect this data using analytics cookies. You can manage your cookie preferences via our cookie banner.
- **Marketing interactions:** When you sign up to receive our newsletters or other marketing communications.

Why We Collect Your Personal Data and the Legal Basis

Under UK data protection law, we must have a **lawful basis** for processing your personal data. The table below explains the purposes for which we process your data and the lawful basis we rely on.

Purpose

To provide our fractional CFO services to you (including preparing engagement letters, delivering financial advisory services, and issuing invoices)

To respond to your enquiries and communicate with you

To manage our client relationship (including notifying you of changes to our terms, policies, or services)

To comply with legal and regulatory obligations (including anti-money laundering obligations under the Money Laundering Regulations 2017)

To send you marketing communications (newsletters, updates, or information about our services that may be of interest to you)

Lawful Basis

Contract performance – processing is necessary for the performance of our contract with you.

Legitimate interests – necessary for our legitimate interest in operating and promoting our business, provided your interests and fundamental rights do not override those interests.

Legitimate interests – necessary to keep our records updated and manage our ongoing relationship with you.

Legal obligation – processing is necessary for compliance with a legal obligation to which we are subject.

Consent – we will ask for your consent before sending direct marketing communications by email. You may withdraw your consent at any time.

Purpose

To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting of data)

To use data analytics to improve our website, services, marketing, and client experience

Lawful Basis

Legitimate interests – necessary for our legitimate interest in ensuring network and information security and preventing unauthorised access.

Legitimate interests – necessary for our legitimate interest in improving our services and tailoring our website content.

Where we rely on **legitimate interests**, we have conducted a balancing test to ensure that our interests do not override your rights and freedoms. If you would like further information about how we have assessed our legitimate interests, please contact us.

Who We Share Your Personal Data With

We may share your personal data with the following categories of recipients, where necessary:

Recipient Category	Examples	Purpose
Service providers	Cloud storage providers (e.g., Google Drive, Microsoft OneDrive), email hosting services, accounting software providers	To enable us to store, process, and manage data in the course of delivering our services

Recipient Category	Examples	Purpose
Professional advisors	Our accountants, insurers, legal advisors, and compliance consultants	To obtain professional advice and manage our business risks
Regulatory authorities	The Information Commissioner's Office (ICO), HMRC, or our professional body (e.g., ACCA)	To comply with legal and regulatory obligations

We do **not** sell your personal data to any third party.

All third-party service providers are required to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes.

International Transfers

We primarily store and process your personal data within the United Kingdom. However, some of our service providers may operate outside the UK (including in the European Economic Area (EEA) or other countries). Where we transfer your personal data outside the UK, we ensure a similar degree of protection is afforded to it by implementing at least one of the following safeguards:

- Transferring to a country that has been deemed by the UK government to provide an adequate level of protection for personal data; or

- Using specific contracts approved by the UK government (International Data Transfer Agreements or Addendum to the EU Standard Contractual Clauses) which give personal data the same protection it has in the UK.

If you would like further information about the specific safeguards applied to transfers of your personal data, please contact us.

Data Retention – How Long We Keep Your Personal Data

We will only retain your personal data for as long as is necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements.

The table below sets out our standard retention periods:

Category of Data	Retention Period
Client engagement and service data (including identity, contact, financial, and engagement data)	For the duration of our engagement with you and for a period of six (6) years after the termination of our engagement (to comply with legal and regulatory requirements, including tax and anti-money laundering obligations)
Enquiry and prospective client data	For a period of twelve (12) months after your last contact with us, unless you become a client
Marketing data (including preferences and consent records)	Until you withdraw your consent or for a period of two (2) years after your last interaction with our marketing communications, whichever is sooner

Category of Data	Retention Period
Technical data (IP addresses and analytics data)	For a period of twenty-six (26) months (standard retention for anonymised analytics data)

In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your Legal Rights

Under the UK GDPR and the Data Protection Act 2018, you have the following rights in relation to your personal data:

Right	What It Means
Right to access	You have the right to request a copy of the personal data we hold about you (known as a “subject access request”).
Right to rectification	You have the right to request that we correct any inaccurate or incomplete personal data we hold about you.
Right to erasure	You have the right to request that we delete your personal data in certain circumstances (e.g., where it is no longer necessary for the purpose for which it was collected, or where you withdraw your consent and there is no other legal basis for processing).

Right

What It Means

Right to restrict processing

You have the right to request that we suspend the processing of your personal data in certain circumstances (e.g., where you contest the accuracy of the data or object to our processing).

Right to data portability

You have the right to request a copy of your personal data in a structured, commonly used, machine-readable format, and to have that data transmitted to another controller, where technically feasible.

Right to object

You have the right to object to our processing of your personal data where we are relying on a **legitimate interest** (or those of a third party) as our lawful basis.

Rights in relation to automated decision-making

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. We do not use automated decision-making in our services.

Right to withdraw consent

Where we are relying on **consent** as our lawful basis (e.g., for marketing communications), you have the right to withdraw that consent at any time.

How to exercise your rights: To exercise any of the above rights, please contact us at info@migasuto.com. We will respond to your request within **one month** (or within **two months** if the request is complex or you have made multiple requests).

No fee required: You will not normally have to pay a fee to exercise any of these rights.

How to Make a Complaint

If you are not satisfied with how we have handled your personal data or responded to a request to exercise your rights, you have the right to lodge a complaint with the **Information Commissioner's Office (ICO)**, the UK supervisory authority for data protection issues.

Contact details for the ICO:

- **Website:** www.ico.org.uk
- **Post:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- **Telephone:** 0303 123 1113

We would, however, appreciate the opportunity to resolve your concerns before you approach the ICO. Please contact us first using the details in Section 1, and we will do our utmost to assist you.

Changes to This Privacy Policy

We keep this Privacy Policy under regular review. Any changes we make will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes. This version was last updated on 1/07/2026

11. Contact Us

If you have any questions about this Privacy Policy or how we handle your personal data, please contact us:

- **By email:** info@migasuto.com