

Movements Consultancy

Privacy Notice, Cookie Notice and Website Terms of Business Use

**Movements Consultancy Limited (Company No. 17323342)
107 Cheapside, London, EC2V 6DN, United Kingdom
Telephone: +44 (0) 20 3633 9218
Email: info@movementsconsultancy.com**

Last updated: July 24, 2026

Document Overview

This document brings together three website-facing legal notices for **Movements Consultancy Limited** in a single, integrated form:

- **Part 1 – Privacy Notice**
- **Part 2 – Cookie Notice**
- **Part 3 – Website Terms of Use**

These notices are intended for an online legal consultancy business with international reach and a client base involved in cross-border conventional and Islamic financing arrangements. They distinguish clearly between website use and formal client engagements, and they reflect the latest revised substantive text as of **July 24, 2026**.

Part 1 – Privacy Notice

1. Who We Are

Movements Consultancy Limited is a company incorporated in England and Wales under company number **17323342**, with its registered office at **107 Cheapside, London, EC2V 6DN, United Kingdom**.

We act as the **controller** of personal data collected through our website and in connection with our business operations, client work, supplier relationships and marketing activities.

We provide legal consultancy services in relation to **cross-border conventional and Islamic international financing arrangements**.

Unless we expressly state otherwise, we are **not authorised or regulated by the Solicitors Regulation Authority**, the Bar Standards Board or any other legal services regulator, and we are not a law firm unless otherwise stated.

2. Privacy Contact

For privacy enquiries, data-subject requests or complaints, please contact our **Privacy Lead**:

Movements Consultancy Limited (Company No. 17323342)
107 Cheapside, London, EC2V 6DN, United Kingdom
Telephone: +44 (0) 20 3633 9218
Email: info@movementsconsultancy.com

Contact method	Details
Email	info@movementsconsultancy.com
Telephone	+44 (0) 20 3633 9218
Address	107 Cheapside, London, EC2V 6DN, United Kingdom

3. What Personal Data We Collect

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

- **Identity data** – such as name, title and job title.
- **Contact data** – such as email address, telephone number and postal address.
- **Business data** – such as employer, role and business contact details.
- **Enquiry data** – information provided when contacting us.
- **Client matter and transaction data** – such as instructions, transaction structures, parties, counterparties, lenders, borrowers, obligors, investors, advisers and other participants, transaction and due-diligence documents, correspondence, authorities, mandates, powers of attorney, approvals, signatures and execution evidence.
- **Financial and compliance data** – such as billing, invoice and payment details; identity-verification documents and identifiers; nationality, residence and tax status; beneficial ownership and control information; KYC and client-risk assessments; sanctions, politically exposed person (**PEP**) and adverse-media screening results; source of funds and source of wealth information; bank account and transaction details; and information needed to prevent fraud, money laundering, terrorist financing, proliferation financing, sanctions breaches or other financial crime.
- **Technical, fraud and cyber-security data** – such as IP address, browser type, device information, authentication and log data, access records, website and system logs, email and network metadata, suspected malicious activity, fraud indicators and security-incident information.
- **Usage data** – such as pages visited, time on page and website interactions.
- **Marketing data** – such as preferences and responses to communications.

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- **Other information you choose to provide** – including information about other individuals where you are authorised to do so.

4. Special-Category and Criminal-Offence Data

Special-category data and criminal-offence data are treated distinctly.

Where necessary, we may process **special-category data** under an applicable **Article 9 UK GDPR** condition, including:

- explicit consent;
- employment or social-protection law;
- vital interests;
- data manifestly made public by the individual;
- legal claims; or
- substantial public interest supported by **Schedule 1 to the Data Protection Act 2018**.

We process **criminal-offence data** only under official authority or where authorised by UK law, including an applicable Schedule 1 condition and policy document where required.

We do not seek this data unless it is **relevant and proportionate**.

5. How We Collect Personal Data

We collect personal data:

- directly from you;
- from your employer, colleagues, clients, agents or advisers;
- from public registers, corporate filings, court records, professional directories, websites, social media and other publicly available sources;
- automatically through cookies and similar technologies; and
- from service providers and business partners, including identity-verification, KYC, sanctions, PEP, adverse-media, fraud-prevention, cyber-security, credit-reference and due-diligence providers, as well as banks, payment providers, counterparties,

transaction participants, professional advisers, regulators, courts, law-enforcement bodies and government authorities.

6. How We Use Personal Data

We use personal data to:

- respond to enquiries and requests;
- assess whether we can provide services;
- provide legal consultancy services;
- manage client, supplier and business relationships;
- issue invoices and process payments;
- maintain internal records;
- comply with legal, tax, accounting and regulatory obligations;
- improve our website, communications and services;
- send service-related and marketing communications where permitted;
- protect our business, staff, systems and clients; and
- establish, exercise or defend legal claims.

7. Lawful Bases for Processing

We rely on one or more of the following lawful bases under UK data protection law:

- **Contract** – where processing is necessary to perform a contract or take steps at your request before entering into one.
- **Legal obligation** – where we need to comply with a legal or regulatory obligation.
- **Legitimate interests** – where processing is necessary for our legitimate business interests, provided your interests and rights do not override those interests.
- **Consent** – where you have given consent, for example for certain cookies or marketing communications.
- **Vital interests** – in limited emergency situations.

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Where we process special-category data, we do so only where an additional lawful condition under UK GDPR applies.

8. Purposes and Lawful-Bases Matrix

Purpose	Main data used	Lawful basis	Legitimate interest where relied on
Enquiries, conflicts and onboarding	Identity, contact, business, enquiry, transaction and screening data	Steps before contract; legal obligation; legitimate interests	Deciding whether and on what terms we can act; avoiding conflicts; managing risk
Providing consultancy services and transactions	Identity, contact, business, client, transaction, authority, signature and financial data	Contract; legitimate interests; legal obligation	Delivering services; coordinating international transactions; protecting participants
KYC, sanctions, PEP, adverse-media and financial-crime checks	Identity-verification, ownership/control, source-of-funds/wealth, screening, criminal-offence and transaction data	Legal obligation; legitimate interests; substantial public interest where applicable	Preventing financial crime, fraud and sanctions exposure; protecting the integrity of transactions
Billing, payments, tax and accounting	Identity, contact, financial and matter data	Contract; legal obligation; legitimate interests	Recovering fees; maintaining accurate business records
Suppliers and business administration	Identity, contact, business, financial and performance data	Contract; legal obligation; legitimate interests	Operating, procuring and improving our business
Website operation, analytics and security	Technical, usage, cookie, consent, fraud and cyber data	Legitimate interests; consent where required; legal obligation	Providing a secure and effective website; detecting abuse; measuring performance
Direct marketing	Identity, contact, business, marketing and engagement data	Consent or legitimate interests, subject to PECR and the right to object	Promoting relevant business-to-business services; maintaining professional relationships
Complaints, disputes and legal claims	Contact, matter, correspondence, complaint, security and transaction data	Legal obligation; legitimate interests; legal claims	Resolving concerns; establishing facts; protecting legal rights
Business transactions and corporate change	Relevant business, client, supplier and due-diligence data	Legitimate interests; legal obligation	Evaluating and implementing a merger, financing, restructuring or sale with appropriate safeguards

9. Sharing Personal Data

We may share personal data with:

- our employees, consultants and contractors;
- IT, hosting, email, CRM and document-management providers;
- accountants, insurers and professional advisers;
- banks and payment processors;
- third parties involved in a matter, transaction or dispute;

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- regulators, courts, tribunals, law-enforcement bodies and government authorities where required; and
- analytics and website service providers.

We share personal data only where necessary, proportionate and subject to appropriate confidentiality, security and data-protection safeguards.

Recipient roles may differ:

Recipient type	Typical role
Internal personnel and service providers acting on instructions	Processor
Independent professional advisers, banks, payment providers, counterparties, transaction parties, regulators and public authorities	Separate controller
Buyer, seller, funder or diligence adviser in a corporate transaction	Controller or processor depending on role

We do not allow processors to use personal data for their own purposes.

10. International Transfers

Because our work and clients are international, recipients may process personal data **outside the United Kingdom**.

Where this occurs, we use a transfer mechanism permitted by the **UK GDPR as amended by the Data (Use and Access) Act 2025** and assess whether the destination's data-protection standard is **not materially lower than the UK standard**, taking account of applicable laws, practices and supplementary safeguards.

Permitted mechanisms may include:

- **UK adequacy regulations;**
- **the UK International Data Transfer Agreement;**
- **the UK Addendum to EU Standard Contractual Clauses;** and
- other lawful transfer mechanisms, including statutory exceptions where strictly applicable.

You may contact our Privacy Lead to request information about the relevant transfer mechanism and a copy of, or access to, applicable safeguards, subject to lawful redactions and confidentiality restrictions.

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11. Data Retention

We retain personal data only for as long as necessary for the purposes for which it was collected, including to meet legal, tax, accounting or regulatory requirements.

Retention Periods

Record type	Retention approach
Enquiry records	12 months after your last contact if you do not become a client
Client matter records	6 years after the matter is closed, unless a longer period is required by law or appropriate for the matter
Accounting records	6 years after the end of the relevant accounting period
Marketing data	Until you opt out or withdraw consent, and ordinarily no more than 24 months after the last meaningful engagement; suppression records are retained as long as needed to honour the opt-out
Declined onboarding, conflict and preliminary screening records	Ordinarily 3 years after the decision, unless a longer period is needed to explain or defend it
KYC, identity-verification and compliance records	Ordinarily 6 years after the relationship or relevant transaction ends, or longer where required by applicable anti-money-laundering, sanctions or professional obligations
Supplier and contractor records	Ordinarily 6 years after the relationship ends
Website and security logs	Ordinarily 12 months, unless required longer to investigate misuse or an incident
Cookie choices and consent records	Ordinarily 2 years after the choice or its replacement, or longer where needed to demonstrate compliance
Complaint records	Ordinarily 6 years after closure
Security-incident records	Ordinarily 6 years after closure, with underlying logs retained only as necessary
Legal holds	Relevant records are preserved until the hold, investigation, claim or proceeding ends and applicable limitation periods expire

When personal data is no longer needed, we securely delete or **irreversibly anonymise** it.

We determine retention periods by reference to:

- purpose;
- volume and sensitivity;
- legal and regulatory duties;
- limitation periods;
- security needs; and

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- the risk of harm.

Backup copies are isolated from routine use and deleted on normal rotation. A legal hold overrides ordinary deletion while required.

12. Your Rights

Depending on the circumstances, you may have the right to:

- access your personal data;
- correct inaccurate or incomplete data;
- request erasure;
- restrict processing;
- object to processing;
- request data portability; and
- withdraw consent where processing is based on consent.

To exercise your rights, contact our Privacy Lead using the details above. We may request proportionate information to verify identity or authority and will normally respond within **one month**, subject to lawful extensions.

These rights are **not absolute**.

13. Automated Decision-Making and Profiling

We may use screening, fraud, cyber-security and risk tools to identify matches, anomalies or risk indicators and to prioritise review.

These tools may involve **profiling**, but we do **not ordinarily make decisions producing legal or similarly significant effects solely by automated means**. A trained person reviews material alerts and contextual evidence.

If we ever rely on solely automated significant decision-making, we will provide legally required information about:

- the logic involved;
- the significance and likely consequences; and
- available safeguards, including human intervention, representations and challenge.

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14. Direct Marketing

We may send direct marketing communications where permitted by **UK GDPR** and the **Privacy and Electronic Communications Regulations (PECR)**.

We rely on:

- **consent** where required, including for electronic marketing to individuals unless a PECR exception applies; and
- **legitimate interests** for proportionate business-to-business marketing to relevant business contacts, subject to PECR and the absolute right to object.

Any soft opt-in is used only where its statutory conditions are met.

You can opt out at any time by:

- using the unsubscribe link;
- changing available preferences; or
- contacting us directly.

Opting out does not affect service communications. We may keep a minimal suppression record to respect your choice.

We do **not sell personal data**.

15. Security

We have put in place risk-based technical and organisational measures designed to protect personal data, including:

- access controls;
- appropriate encryption;
- backups;
- supplier controls;
- staff awareness;
- incident response; and
- periodic review.

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However, no online system can be guaranteed completely secure. Please use secure channels we specify and notify us promptly of suspected compromise.

16. Complaints

From **June 19, 2026**, you may submit a **data-protection complaint** to our Privacy Lead electronically by email or by any other contact method listed above.

We will:

- acknowledge the complaint within **30 days**;
- investigate without undue delay;
- take appropriate steps, including gathering relevant information and involving suitably independent personnel where practicable;
- keep you informed of progress at appropriate intervals; and
- provide a reasoned written outcome without undue delay.

We will keep records of:

- the complaint;
- evidence;
- the investigation;
- communications;
- decisions; and
- remedial action.

This internal process does **not** restrict your right to complain to the **UK Information Commissioner's Office (ICO)** at any time.

ICO contact	Details
Website	ico.org.uk
Telephone	0303 123 1113

17. Overseas Supplements

If you are outside the UK, local privacy law may give you additional rights or require a jurisdiction-specific supplement.

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Where legally required, we will provide the relevant supplement at or before collection, and it will prevail to the extent of any conflict.

You may contact our Privacy Lead to request the supplement applicable to your location.

18. Changes to This Privacy Notice

We may update this Privacy Notice from time to time. Any updates will be posted on this page with a revised **Last updated** date.

Part 2 – Cookie Notice

1. Scope

This Cookie Notice explains how **cookies and similar technologies** are used on our website.

For this purpose, “technologies” includes:

- cookies;
- local storage;
- software development kits;
- pixels;
- web beacons;
- tags;
- scripts; and
- similar storage or access technologies used for website operation, security, analytics, embedded content, online forms, CRM integration, marketing and recording consent choices.

2. What Cookies Are

Cookies are small text files placed on or read from your device.

They help support website functionality and may be used for:

- operation;

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- security;
- analytics;
- embedded content;
- forms;
- CRM integration;
- marketing; and
- recording consent choices.

3. Categories of Technologies

We may use the following categories of cookies and similar technologies:

Category	Description
Strictly necessary	Required for the website to operate and cannot usually be switched off; may be set in response to actions such as submitting forms or setting privacy preferences
Performance / analytics	Help us understand how visitors use the website so we can improve performance and content
Functional	Remember preferences or previous interactions
Marketing	May be used to deliver relevant advertising or measure marketing effectiveness

4. Technology Inventory

We maintain and periodically audit the following live inventory. It identifies each technology currently disclosed as active.

Name	Provider	Purpose	Category	Duration	First/third party	Consent status
Consent-preference record	Movements Consultancy Limited or consent-platform provider	Stores and proves the visitor's choices	Strictly necessary	Ordinarily up to 2 years	First party, or provider acting for us	Always active

5. Current Website Position

The **consent-preference record** listed above is the **only technology currently disclosed as active**.

No analytics, marketing, functional, embedded-content, forms/CRM, pixel/tag or other non-essential technology is currently listed as deployed.

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We audit the website periodically and will update this inventory **before** deploying any additional technology, including its:

- exact name;
- provider;
- purpose;
- category;
- duration;
- first- or third-party status; and
- consent or exemption status.

6. Consent and Exemptions

Except where a statutory exemption applies, we obtain valid consent before storing information on, or accessing information from, your device.

The following principles apply:

- non-essential technologies are **blocked by default** until consent is given;
- pre-ticked boxes, inactivity and continued browsing do **not** constitute consent;
- **“Accept all”** and **“Reject all”** are offered with equal prominence and comparable ease;
- granular category controls are available; and
- refusal does not result in unnecessary detriment.

You may withdraw or change consent at any time as easily as you gave it, using the **persistent preferences tool**. Withdrawal prevents future use but does not retrospectively invalidate earlier processing.

Technologies may operate without consent only where they are:

- strictly necessary to provide a service you expressly request; or
- covered by another applicable PECR exemption, including current low-risk statutory exemptions such as qualifying:
- security functions;

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- audience-measurement functions;
- appearance functions; or
- location functions,

provided every legal condition is met.

Where an exemption is used, we:

- document the exemption;
- use only the minimum data required;
- provide clear information; and
- honour any legally required objection or opt-out.

Analytics, advertising, cross-site tracking and optional embedded content remain **off** unless consent or a specific exemption applies.

7. Managing Cookies

You can control cookies and similar technologies through:

- our cookie banner or persistent preferences tool;
- your browser settings; and
- deleting cookies and local storage from your device.

Disabling strictly necessary technologies may affect website functionality.

8. Third-Party Technologies

Third-party analytics, embedded video, maps, social media, forms, CRM or other content may allow a provider to set or read technologies and process data as its own controller.

Optional third-party content is blocked or presented behind a consent mechanism until the required choice is made.

The inventory and preference centre identify the relevant provider, purpose and duration. The provider's own privacy information may also apply.

We contractually control providers acting as our processors.

9. Changes to This Cookie Notice

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We may update this Cookie Notice from time to time to reflect changes in:

- our website;
- our service providers; or
- legal requirements.

Part 3 – Website Terms of Use

1. Acceptance of Terms

By accessing or using this website, you agree to these Terms of Use.

If you use the website on behalf of an organisation, you confirm that you have authority to bind it.

If you do not agree, you should not use this website.

These Terms apply **only** to website use. Any consultancy engagement is governed by a **separate written agreement**.

2. Information Only; No Legal Advice

The content on this website is provided for **general information purposes only**.

It is **not**:

- legal advice;
- regulatory advice;
- tax advice;
- accounting advice;
- investment advice;
- Shariah advice; or
- any other professional advice tailored to a particular person or transaction.

It should not be relied upon as such.

Content may not reflect the law or practice of every jurisdiction and may become outdated.

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You should obtain specific professional advice before taking, or refraining from taking, any action based on this website.

3. No Client Relationship

Your use of this website, contact with us, or submission of an enquiry does **not** create:

- a client relationship;
- a solicitor-client relationship;
- a fiduciary relationship;
- any duty on our part to act for you; or
- any obligation to keep unsolicited information confidential,

unless and until we:

1. complete any required conflicts and compliance checks; and
2. expressly agree an engagement in writing.

Do **not** send confidential, time-critical or transaction-sensitive material until then.

4. Unregulated Legal Consultancy

Unless we expressly state otherwise, we operate as an **unregulated legal consultancy** and are not authorised or regulated by:

- the Solicitors Regulation Authority;
- the Bar Standards Board; or
- any other legal services regulator.

If you require:

- regulated legal services;
- reserved legal activities;
- rights of audience;
- conduct of litigation; or
- protection under a regulator's compensation or complaints scheme,

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you should confirm the provider's status before instructing them.

Our work may involve international transactions, but this website does not represent that we are authorised to practise or solicit business in every jurisdiction.

5. Accuracy and Availability

We aim to ensure that website information is accurate and up to date, but we make no warranties or representations that it is:

- complete;
- accurate; or
- current.

We may amend, update, suspend or remove content at any time without notice.

We do not guarantee continuous, timely or error-free availability and may suspend, withdraw or restrict the website for:

- maintenance;
- security;
- legal reasons; or
- operational reasons.

6. Links to Our Website

You may link to our public home page fairly and lawfully, without suggesting association, approval or endorsement where none exists.

You must not:

- frame or mirror the website;
- link from unlawful or misleading content; or
- use our branding without permission.

We may withdraw linking permission at any time.

7. Information Submitted Through the Website

You are responsible for ensuring that information you submit is:

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- lawful;
- accurate;
- non-infringing;
- free from malicious code; and
- provided with authority where it concerns personal data about others.

Website forms and email are not guaranteed secure. Use any secure channel we specify for sensitive transaction material.

We may reject, quarantine or delete submissions where reasonably necessary for:

- security;
- compliance; or
- legal reasons.

8. Intellectual Property and Use Restrictions

All content on this website, including text, graphics, logos, images and design, is owned by or licensed to us and protected by intellectual-property laws.

You may view, print or download material for **personal or internal business use only**, provided that copyright and proprietary notices remain intact.

You must not, without our prior written consent:

- copy;
- reproduce;
- scrape;
- text-and-data mine;
- train an artificial-intelligence model on;
- distribute;
- modify;
- commercially exploit; or

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- create derivative works from

any website content, except to the extent a restriction cannot lawfully apply.

“Movements Consultancy” and associated names, logos and branding may not be used without permission.

9. Prohibited Use

You must not use this website:

- unlawfully or fraudulently;
- to transmit malware, spyware, spam or harmful content;
- to attempt unauthorised access to our systems;
- to probe, scan, test, disrupt or circumvent the security of our systems, accounts, networks or data;
- to infringe our rights or the rights of others;
- to submit defamatory, infringing, confidential, unlawful or offensive information; or
- to use automated means to scrape, harvest, index or extract content or data, impose an unreasonable load, impersonate another person, or facilitate sanctions evasion, fraud, money laundering or other financial crime.

We may:

- block access;
- remove material;
- preserve evidence; and
- report suspected unlawful activity

where reasonably necessary.

You must not misuse the website under the **Computer Misuse Act 1990** or other applicable law.

10. Third-Party Links

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This website may contain links to third-party websites or embedded content from third-party websites and services.

They are provided for convenience only and do not imply endorsement.

We do not control them and are not responsible for their:

- availability;
- content;
- security;
- terms; or
- privacy practices.

You access them at your own risk and should review their applicable terms and notices.

11. Limitation of Liability

Nothing on this website limits liability arising under a **separate written engagement**.

Subject to the paragraph below and to the fullest extent permitted by law:

- we exclude implied conditions, warranties and representations relating to the website;
- we are not liable for loss arising from reliance on general website content;
- we are not liable for loss arising from unavailability, third-party content or malware outside our reasonable control; and
- we are not liable for loss of profit, revenue, business, opportunity, goodwill, anticipated savings or data, or for indirect or consequential loss.

If liability for **free website use** cannot be excluded, our aggregate liability is limited to **£100**, except where that limit would be unfair or unlawful.

Nothing in these Terms excludes or limits liability for:

- death or personal injury caused by negligence;
- fraud;
- fraudulent misrepresentation; or
- any other liability that cannot lawfully be excluded or limited.

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If you are a consumer, these Terms do not affect mandatory consumer rights, and we do not exclude liability for foreseeable loss caused by our breach where the law prohibits that exclusion.

12. Cyber Security and Viruses

We use reasonable security measures but do not guarantee that this website will be secure or free from bugs, vulnerabilities or malware.

You are responsible for using appropriate:

- device protections;
- browser protections;
- access controls;
- backups; and
- malware-protection measures.

You must notify us promptly of a suspected vulnerability and must not publicly disclose or exploit it before we have had a reasonable opportunity to investigate and remediate.

13. Governing Law and Jurisdiction

These Terms of Use, and any non-contractual obligations, dispute or claim arising out of or in connection with them, are governed by the **laws of England and Wales**.

The courts of **England and Wales** have exclusive jurisdiction, except that a consumer resident in another part of the UK may bring proceedings in the courts of their home jurisdiction and retains any mandatory rights that cannot be displaced.

If any provision is invalid or unenforceable, it will be modified to the minimum extent necessary or severed, without affecting the remainder.

A delay in enforcement is not a waiver.

Only we and the user may enforce these Terms under the **Contracts (Rights of Third Parties) Act 1999**.

Contact Details

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