

PHOENIX REFINING

PRIVACY POLICY

Effective date: 26 August 2026 | Last updated: 26 August 2026

Your privacy matters. Phoenix Refining Ltd uses personal information only where it is needed to respond to enquiries, provide refining and purchasing services, protect customers and the business, and meet legal and accounting requirements. We do not sell personal information.

1. Who we are

Phoenix Refining Ltd is the controller of the personal information described in this policy. This means we decide why and how that information is used.

Company details	Information
Company	Phoenix Refining Ltd
Company number	11772897
Registered office	108 Beckenham Road, Beckenham, England, BR3 4RH
Email	darrell@phoenixrefining.co.uk
Telephone	07508 297567

This policy applies when you use our website, contact us, request a quotation, send precious metals to us, sell precious metals to us, use our refining services, or otherwise deal with Phoenix Refining Ltd.

2. Personal information we collect

Depending on how you interact with us, we may collect:

- Contact information, including your name, postal and delivery address, email address and telephone number.
- Enquiry and communication records, including website form submissions, emails, telephone notes, messages, quotations and customer instructions.
- Transaction and refining information, including descriptions, photographs, weights, stated and tested purity, assay or XRF results, refining statements, bar or grain requirements, hallmarking instructions, valuations and offers.
- Delivery and collection information, including sender and return addresses, tracking numbers, proof of posting, insurance information, delivery confirmations and collection arrangements.
- Payment information, including the account name, bank details needed to make or confirm a payment, payment references and transaction records. We do not normally collect card details through the website.
- Identity, ownership and provenance information where reasonably required, such as photographic identification, proof of address, proof of ownership, purchase records or information about the source of precious metals.
- Technical information about use of the website, such as IP address, device and browser information, pages visited, timestamps, cookie choices and security logs.
- Complaint, dispute and legal information, including the facts of a complaint, supporting evidence and correspondence with insurers, professional advisers, regulators or law-enforcement bodies.

Please do not send special-category information, such as medical information, unless we specifically ask for it and it is necessary for a particular matter.

3. How we obtain personal information

We usually obtain information directly from you when you use our website, contact us, submit items, accept an offer or ask us to provide a service. We may also receive information from:

- a person acting for you, a joint owner, executor, business representative or introducer;
- postal operators, couriers, insurers, payment providers and banks;
- assay offices, hallmarking providers, refiners, laboratories or other specialist service providers;
- public registers, online marketplaces or forums, where checks are reasonably necessary; and
- law-enforcement bodies, courts, regulators or fraud-prevention sources where permitted by law.

4. How and why we use personal information

We only use personal information where we have a lawful basis under UK data protection law. The main purposes and lawful bases are set out below.

Purpose	Information typically used	Lawful basis
Responding to enquiries, preparing quotations and discussing a possible transaction	Contact details, enquiry contents, item descriptions and photographs	Steps requested before entering a contract and our legitimate interests in responding to prospective customers
Buying precious metals or providing refining, bar-making, hallmarking, return and delivery services	Contact, transaction, testing, assay, refining, delivery and payment information	Performance of our contract with you and steps requested before entering it
Testing materials, verifying weight or purity and recording the outcome	Item descriptions, images, weight, purity, assay or XRF results and customer instructions	Performance of our contract and our legitimate interests in accurate, transparent transactions
Making payments, maintaining accounts, issuing records and meeting tax obligations	Identity, transaction, invoice, bank and payment information	Performance of our contract and compliance with legal obligations
Checking identity, ownership and provenance, preventing fraud and avoiding stolen or unlawfully obtained material	Contact, identity, ownership, provenance, transaction and security information	Our legitimate interests in protecting customers and the business, and legal obligations where they apply
Managing complaints, insurance matters, disputes and legal claims	Contact, transaction, delivery, communication and supporting evidence	Our legitimate interests in resolving disputes and establishing, exercising or defending legal claims; legal obligations where applicable
Operating, securing and improving the website	Technical information, security logs and cookie information	Our legitimate interests in running a secure and effective website; consent for non-essential cookies and analytics
Sending marketing or service updates	Name, email address, telephone number and communication preferences	Consent, or legitimate interests where electronic-marketing law permits; you may opt out at any time

We do not use personal information for solely automated decision-making that produces legal or similarly significant effects.

5. If you do not provide information

Some information is optional, but we need certain contact, transaction, delivery, ownership and payment information to provide quotations, receive or return items, make payments and complete transactions safely. If required information is not provided, we may be unable to proceed, may delay a transaction while checks are completed, or may return items in accordance with our Terms and Conditions.

6. Sharing personal information

We share personal information only where it is necessary, proportionate and lawful. Recipients may include:

- website hosting, email, cloud-storage, IT-support and cybersecurity providers;
- banks, payment providers, accountants, tax advisers and auditors;
- Royal Mail, couriers, delivery providers and insurers;

- assay offices, hallmarking providers, laboratories and specialist processors where needed to fulfil your instructions;
- identity-verification and fraud-prevention service providers where appropriate;
- professional advisers, including solicitors and insurers; and
- courts, law-enforcement agencies, HMRC, regulators or other public authorities where disclosure is required or permitted by law.

Our service providers must handle personal information only for authorised purposes and protect it appropriately. We do not sell or rent customer information to third parties.

7. International transfers

Some technology or service providers may store or access information outside the United Kingdom. Where a restricted transfer occurs, we will use an approved legal mechanism and appropriate safeguards, such as UK adequacy regulations, the UK International Data Transfer Agreement or the UK Addendum to approved standard contractual clauses, together with any necessary risk assessment and security measures.

8. Security

We use reasonable technical and organisational measures designed to protect personal information against accidental loss, unauthorised access, alteration, disclosure or destruction. Measures may include access controls, password-protected systems, secure providers, restricted staff access, secure disposal and verification before releasing information or materials. No internet or email system is completely secure, so please avoid sending unnecessary sensitive information by ordinary email.

9. How long we keep personal information

We keep personal information only for as long as reasonably necessary for the purpose for which it was collected, including legal, tax, accounting, fraud-prevention, insurance and claims requirements. Our normal retention approach is:

- Enquiries that do not proceed: normally up to 24 months after the last meaningful contact.
- Customer, refining, purchase, assay, payment, invoice and delivery records: normally six years from the end of the company financial year to which the record relates.
- Identity, ownership and provenance records: only for as long as necessary for the verification, fraud-prevention, legal or claims purpose, normally no longer than six years unless a longer period is required.
- Complaints, disputes and legal claims: normally six years after the matter is closed, or longer while proceedings or a legal hold continue.
- Marketing records: until you withdraw consent or opt out. We may retain minimal suppression information so that we respect your preference.
- Website logs and cookies: for the periods described in our Cookie Policy or cookie-control panel.

These periods may be shortened where information is no longer needed or extended where law, an investigation, insurance requirement or legal claim requires it. Deleted information may remain in secure backups for a limited period before being overwritten.

10. Marketing communications

We may send information about Phoenix Refining services where you have asked to receive it or where the law otherwise permits. Every electronic marketing message will provide a straightforward way to opt out. You can also opt out at any time by emailing darrell@phoenixrefining.co.uk. Service messages about an active enquiry or transaction are not marketing and may still be sent where necessary.

11. Cookies and website analytics

Our website may use cookies and similar technologies. Strictly necessary cookies support functions such as security and remembering privacy choices. We use non-essential analytics, advertising or similar cookies only where you have given valid consent through the cookie-control panel. You can reject non-essential cookies or change your preferences at any time using the Cookie Settings control on the website.

Further information about the cookies in use, their providers, purposes and duration is available through the Cookie Settings control and our separate Cookie Policy. Browser settings can also block or delete cookies, although this may affect some website functions.

12. Your data protection rights

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

- ask for access to the personal information we hold about you;
- ask us to correct inaccurate or incomplete information;
- ask us to erase information where there is no continuing lawful reason to keep it;
- ask us to restrict how information is used;
- object to processing based on legitimate interests and object at any time to direct marketing;
- receive certain information you provided in a structured, commonly used, machine-readable format, or ask us to transfer it where technically feasible; and
- withdraw consent at any time where processing is based on consent, without affecting earlier lawful processing.

These rights are not absolute and exemptions may apply. We may need to verify your identity before responding. We normally respond within one month and do not charge a fee unless a request is manifestly unfounded, excessive or repetitive.

To exercise a right, email darrell@phoenixrefining.co.uk or write to Phoenix Refining Ltd at the registered office address above.

13. Complaints

Please contact us first if you are concerned about how we use personal information. We will investigate and respond as soon as reasonably practicable.

You also have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection:

- Website: <https://ico.org.uk/make-a-complaint/>
- Telephone: 0303 123 1113
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

14. Children

Phoenix Refining services are intended for people aged 18 or over. We do not knowingly enter transactions with children or intentionally collect their information. If you believe a child has provided personal information, please contact us so that we can take appropriate action.

15. Third-party websites

The website may contain links to third-party websites or services. Those organisations control their own use of personal information, and their privacy notices should be reviewed separately. Phoenix Refining Ltd is not responsible for third-party privacy practices.

16. Changes to this policy

We may update this policy to reflect changes in our services, providers or legal obligations. The current version will be published on the website with its effective date. Material changes will be highlighted where appropriate.

17. Contact us

Questions, requests and complaints about this policy or our use of personal information should be sent to:

Phoenix Refining Ltd

108 Beckenham Road, Beckenham, England, BR3 4RH

Email: darrell@phoenixrefining.co.uk

Telephone: 07508 297567