

Privacy Notice

Treasury Works Limited · Effective date: October 2026 · Version 1.1

1. Who we are

Treasury Works Limited (“Treasury Works”, “we”, “us”, “our”) provides treasury and investment-income administration to UK academy trusts. This notice explains what personal data we hold, why we hold it, who we share it with, and the choices you have. It applies to the staff and officers of the trusts we work with, to people who enquire about our service, and to visitors to our website.

We are the data controller for the personal data described here. Our registered office is 45 Knottingley Drive, Great Sutton, Ellesmere Port, CH66 4XF and our company number is 17327514. Treasury Works Limited is registered with the Information Commissioner’s Office, registration number **[INSERT ICO REGISTRATION NUMBER]**.

If you have any questions about this notice or about how we use your data, contact us at admin@treasuryworks.co.uk

We are a small business and are not required by law to appoint a Data Protection Officer.

2. The personal data we collect

Most of the information we handle relates to the trust as an organisation rather than to individuals. Where we do process personal data, it falls into these categories:

Category	Examples	Where it comes from
Contact and identity data	Name, job title, the trust you work for, work email, work telephone number.	You, your trust, LinkedIn, the GIAS register, Companies House, other public sources.
Correspondence	Emails, letters, meeting notes, and records of calls with you.	You, during the course of our dealings.
Verification data (directors)	Full name, date of birth, residential address, nationality, and identification details required to onboard your trust to the deposit platform.	The individual concerned, or the trust on their behalf.
Financial administration data	Account references, cashflow figures, and deposit information belonging to the trust. This is mainly organisational data but may name individuals as signatories or approvers.	The trust, in the course of delivering the service.
Website and technical data	IP address, device and browser type, pages viewed, and anything you submit through a contact form.	Your device, through cookies and analytics.

3. Why we use your data, and our lawful basis

Under UK data protection law we must have a lawful basis for using your personal data. Ours are set out below.

What we do	Lawful basis	Why
Respond to enquiries and present our service	Legitimate interests	To answer questions from finance staff at trusts that may want to work with us.
Deliver and administer the service	Legitimate interests	To run our consultancy and perform our agreement with your trust, including reporting, cashflow modelling and journal preparation.
Onboard your trust to the deposit platform	Legitimate interests / legal obligation	To pass the verification data the platform needs so your trust can open its account. The platform provider carries its own anti-money-laundering obligations.
Keep accounting and tax records	Legal obligation	To meet our statutory record-keeping duties.
Respond to lawful requests from authorities	Legal obligation	To comply with the law and with requests from regulators, HMRC or law enforcement.
Send relevant updates to trust finance contacts	Legitimate interests	To keep the finance staff we work with, or who have asked to hear from us, informed. You can opt out at any time.
Keep our systems and information secure	Legitimate interests	To protect our business, our clients and their data.
Non-essential website cookies and analytics	Consent	Only used where you agree. See section 11.

Where we rely on legitimate interests, we have weighed our interests against your rights and are satisfied our use is proportionate. You can ask us for more detail on this assessment at any time.

4. Who we share your data with

We do not sell your data and we do not use it for third-party advertising. We share it only where we need to:

- Flagstone Group Ltd (authorised and regulated by the Financial Conduct Authority under the Payment Services Regulations 2017, FRN 605504), the deposit platform. We pass the verification data described in section 5 so your trust can be onboarded. Flagstone is a separate data controller for its own client-verification, anti-money-laundering and platform obligations, and has its own privacy notice.
- Our service providers, such as IT and cloud storage, email and our accountant. They act only on our instructions under written terms and cannot use your data for their own purposes.
- Our professional advisers, such as solicitors and insurers, where we genuinely need their input.
- Regulators, HMRC and law enforcement, where we are legally required to disclose.
- A buyer or successor, if we ever sell or reorganise the business, subject to the same protections set out here.

5. Passing director details to the deposit platform

To open a platform account in your trust's name, Flagstone requires personal details for two of the trust's directors who are registered at Companies House. This normally includes full name, date of birth, residential address and identification details. We collect these only for onboarding, pass them securely to Flagstone, and do not use them for anything else. Flagstone then holds and processes them under its own anti-money-laundering duties. If you would rather provide these details to Flagstone directly, tell us and we will arrange it.

6. Marketing

Our marketing is aimed at academy trusts and the finance professionals who work for them, not at private individuals. Where we contact trust finance staff by email about our service, we rely on legitimate interests and, where the trust is a corporate subscriber, the relaxed rules for business-to-business electronic marketing. Every message includes a simple way to opt out. If you opt out, we keep a minimal record of your request so we can honour it, and we stop sending you marketing.

7. How long we keep your data

Type of data	Retention
Enquiries that do not become clients	Up to 24 months from last contact, then deleted.
Client and contract records	For the length of the engagement, then 6 years, to meet contractual, tax and limitation-period requirements.
Accounting and tax records	6 years, as required by law.
Marketing opt-out records	Kept for as long as needed to make sure we honour your opt-out.
Website and analytics data	Retained for a short period only, in line with our cookie settings.

8. Where your data is held

We store data on systems located in the UK or European Economic Area wherever possible. If any of our service providers process data outside the UK, we make sure an appropriate safeguard is in place, such as a UK adequacy decision or the International Data Transfer Agreement. You can ask us for details of any transfer that affects you.

9. Automated decision-making

We do not make decisions about you by automated means that produce legal or similarly significant effects. Our cashflow and portfolio tools support the service but any decision about your trust's funds is taken by your trust's authorised signatories, not by us and not automatically.

10. How we protect your data

We apply measures appropriate to a business of our size: access controls, encryption of data in transit, secure storage, and due diligence on the suppliers we use. Access to personal data is limited to the two directors and to service providers who need it to do their job. We review these measures periodically.

11. Cookies and our website

Our website uses essential cookies that are needed for it to work, and, where you agree, analytics cookies that help us understand how the site is used. We ask for your consent before setting any non-essential cookie, and you can change your choice at any time through the Cookie settings link in the footer of every page of our website.

12. Your rights

Under UK data protection law you have the right to:

- ask for a copy of the personal data we hold about you;
- ask us to correct data that is wrong or incomplete;
- ask us to delete data where there is no good reason for us to keep it;
- ask us to restrict how we use your data while a query is resolved;
- object to us using your data where we rely on legitimate interests, including for marketing;
- ask us to transfer certain data to you or another provider; and
- withdraw consent, where we relied on it, at any time.

To exercise any of these, contact us using the details in section 1. We will respond within one month. There is normally no charge.

13. Changes to this notice

We may update this notice from time to time. The version and effective date at the top show when it last changed. If we make a material change, we will tell the trusts we work with directly.

14. How to complain

If you are unhappy with how we have handled your data, please tell us first using the details in section 1 so we can put it right. You also have the right to complain to the Information Commissioner's Office: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Helpline: 0303 123 1113. Website: ico.org.uk