

Epiphany LFP Ltd

Privacy Notice

How we collect, use and protect personal information

Effective: 26 August 2026

At a glance

- We collect only the personal information we reasonably need to provide our services, run our business and meet legal obligations.
- We do not sell or rent personal information to third parties.
- Our AI-assisted tools are designed to minimise unnecessary personal data. You should use estimates, ranges and anonymised descriptions where possible.
- We do not use solely automated decision-making to make decisions about you that have legal or similarly significant effects.
- You can ask us about your information or exercise your data protection rights at lf@epiphanylfp.com.

This Privacy Notice explains when and why Epiphany LFP Ltd collects personal information, how we use it, when we share it, how long we keep it and the rights available to you. It applies to our websites, apps and digital tools where we act as controller, memberships, courses, events, purchases, subscriptions, enquiries and professional services.

Some tools that Epiphany use run inside third-party AI platforms or services that have their own privacy terms. Where that happens, this notice explains Epiphany's role and you should also read the privacy information provided by the platform you choose to use.

1. Who we are

Epiphany LFP Ltd ("Epiphany", "ELFP", "we", "us" or "our") is the controller of personal information covered by this notice unless we tell you otherwise.

- Company: Epiphany LFP Ltd
- Registered in England & Wales: 12051588
- Registered office: 696 Yardley Wood Road, Billesley, Birmingham, B13 0HY, United Kingdom
- ICO registration number: Z8682916
- Privacy contact: Judith Farrall-Wilks
- Email: lf@epiphanylfp.com
- Telephone: +44 (0)1584 706629

We have not appointed a statutory Data Protection Officer. Privacy enquiries and rights requests should be sent to the privacy contact above.

2. The data protection framework

We process personal information under the UK data protection framework, including the UK GDPR, the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003 (PECR), and relevant amendments including the Data (Use and Access) Act 2025.

We aim to use personal information lawfully, fairly and transparently; collect only what is relevant; keep it accurate; retain it only as long as needed; and protect it with appropriate technical and organisational measures.

3. What personal information we collect

The information we collect depends on how you interact with us. It may include:

- identity and contact information, such as your name, email address, telephone number and postal address;
- account and membership information, including login, subscription, course and participation records;
- transaction information, such as purchases, invoices and payment status (payment card details are normally processed by our payment provider rather than stored by Epiphany);
- service information you choose to give us, including financial circumstances, goals, questions, planning information, documents or correspondence relevant to the service you request;
- communications, feedback, complaints, survey responses and records of our interactions with you;
- technical and usage information, such as IP address, browser/device information, cookies, pages viewed, referral source and interaction data;
- marketing preferences and information about how you engage with our communications;
- professional information where you are a practitioner, member, supplier, partner or participant in Epiphany training or accreditation.

Special category and sensitive information

Some life-planning, safeguarding or financial-harm situations may involve information about health, disability, ethnicity, religion or other special category data, or information relating to alleged criminal conduct. We do not ask you to provide this information unless it is relevant and necessary. Where we intentionally process special category data, we will identify an appropriate condition under data protection law, such as explicit consent or another lawful condition that applies to the circumstances.

Please do not send identity-document numbers, passwords, security codes, full card details or other unnecessary high-risk information unless we have specifically asked for it through an appropriate secure method.

4. How we collect personal information

We may obtain information:

- directly from you when you enquire, register, buy, subscribe, attend, complete a form, book a session, join a community, contact us or provide information during a professional engagement;
- through your use of our websites, apps and digital services, including cookies and analytics where permitted;
- from a professional or organisation acting with your authority, such as a planner, adviser, solicitor, accountant or employer;
- from publicly available sources where this is appropriate and lawful;
- from service providers that support payments, website operation, communications, fraud prevention or account administration.

If we obtain personal information about you from another source, we will provide appropriate privacy information within the timescales required by law unless an exception applies.

5. Why we use personal information and our lawful bases

We use personal information only where we have a lawful basis. The main purposes and bases are:

Purpose	Examples	Main lawful basis
Provide services and manage our relationship	Responding to enquiries; memberships; courses; planning services; support; fulfilment; account administration	Contract; steps at your request before entering a contract; legitimate interests
Process payments and business records	Orders, invoicing, refunds, accounting, and audit records	Contract; legal obligation; legitimate interests
Operate and improve services	Service administration, quality assurance, analytics, troubleshooting, product improvement and security	Legitimate interests; consent where required for cookies/technologies
Communicate with you	Service messages, changes, support, feedback and relevant operational notices	Contract; legitimate interests
Marketing and community communications	Newsletters, events, updates and offers	Consent where required; legitimate interests/soft opt-in where permitted by PECR
Protect people and the business	Fraud prevention, cyber security, safeguarding, complaints and legal claims	Legitimate interests; legal obligation; establishment, exercise or defence of legal claims where applicable
Meet legal duties	Tax, accounting, regulatory, data protection and lawful requests from authorities	Legal obligation

Legitimate interests

Where we rely on legitimate interests, we consider whether the use is necessary and proportionate and whether your rights and interests override ours. Examples include operating and improving our services, keeping systems secure, preventing fraud, maintaining business records and communicating with existing customers about closely related services where the law permits.

Consent

Where we rely on consent, you may withdraw it at any time. Withdrawal does not affect processing that was lawful before consent was withdrawn.

6. AI-assisted tools and EpiphanyLFP

Epiphany LFP and related tools may use third-party AI platforms as structured thinking assistants. They can help explain concepts, organise information, model scenarios, surface trade-offs, draft summaries and support planning conversations.

- Use estimates, ranges and anonymised descriptions wherever possible.
- Do not put passwords, verification codes, full bank or card numbers, National Insurance numbers, tax references or unnecessary identity-document data into AI chats.
- Epiphany does not receive or store the content of a chat conducted entirely within your own third-party AI account unless you choose to send that content to us separately.
- The AI provider processes information under its own terms and privacy arrangements. Its infrastructure may be outside the UK.
- AI output should be reviewed critically. AI is not used by Epiphany as a substitute for professional judgement or as a regulated advice file.

We do not use solely automated decision-making to make decisions about you that produce legal or similarly significant effects. We may use non-significant automation, analytics or segmentation to operate services and tailor communications.

7. Who we share personal information with

We do not sell or rent personal information to third parties. We may share information where reasonably necessary with carefully selected recipients, including:

- website, hosting, cloud, CRM and communications providers;
- payment processors and ecommerce providers;
- AI, software, analytics and technical service providers where you use functionality supported by them;
- accountants, insurers, legal advisers, auditors and other professional advisers;
- delivery partners, contractors or practitioners where necessary to provide a service and where appropriate contractual safeguards apply;
- public authorities, regulators, courts, law-enforcement bodies or other recipients where disclosure is required or permitted by law;
- a purchaser, investor or successor organisation if part or all of our business is reorganised, sold or transferred, subject to appropriate safeguards.

Where another professional receives information directly from you or provides their own professional service, they may be a separate controller responsible for their own privacy obligations.

8. International transfers

Some of our technology and service providers may process personal information outside the United Kingdom, including in the United States or other countries.

Where a restricted international transfer takes place, we use a lawful transfer mechanism as appropriate. This may include UK adequacy regulations (including the UK Extension to the EU-US Data Privacy Framework where applicable), the UK International Data Transfer Agreement, the UK Addendum to approved contractual clauses, or another safeguard permitted by UK data protection law. Where required, we consider the risks of the transfer and the protections available.

You can contact us if you would like more information about the safeguards relevant to a particular transfer.

9. How long we keep information

We keep personal information only for as long as reasonably necessary for the purpose for which it was collected, including legal, accounting, tax, contractual, security and dispute-resolution requirements.

Retention varies by record type. As a general guide:

- enquiries that do not become a customer relationship are normally retained only for a limited period appropriate to follow-up and record-keeping;
- customer, contractual and transaction records may be retained for up to six years after the relationship or transaction ends, and longer where required by law or a live dispute;
- tax and accounting records are retained for the period required by applicable law;
- marketing records are retained while you remain subscribed, with a limited suppression record kept where necessary to respect an opt-out;
- technical, cookie and analytics information is retained according to the relevant service and our Cookie Policy.

We periodically review information and securely delete or anonymise it when it is no longer required.

10. Security

We use appropriate technical and organisational measures designed to protect personal information against accidental or unlawful loss, alteration, disclosure, destruction or unauthorised access. Measures may include access controls, secure authentication, encryption in transit where appropriate, supplier due diligence, backups, staff/contractor controls and incident-management processes.

No internet or cloud service can be guaranteed to be completely secure. You are responsible for protecting passwords and access credentials for services you control and for avoiding unnecessary disclosure of sensitive information.

11. Your data protection rights

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

- be informed about how your personal information is used;
- access the personal information we hold about you;
- have inaccurate or incomplete information corrected;
- ask us to erase personal information in certain circumstances;
- ask us to restrict processing in certain circumstances;
- receive certain information in a portable format and transmit it to another controller where the right applies;
- object to processing based on legitimate interests and object at any time to direct marketing;
- withdraw consent where processing is based on consent;
- raise concerns about automated decision-making where the relevant legal rights apply;
- complain to the Information Commissioner's Office.

To exercise a right, email lfp@epiphanylfp.com or write to the registered office above. We may need to verify your identity. We normally respond within one month, subject to the extensions and exceptions allowed by law.

12. Marketing communications

We may send information about Epiphany news, services, events, tools and opportunities where we have a lawful basis to do so. For electronic marketing, we comply with PECR and will seek consent where required. In appropriate circumstances, the law permits marketing to existing customers about similar products or services using the "soft opt-in", provided a clear opt-out is offered.

You can opt out of marketing at any time by using an unsubscribe link or contacting lfp@epiphanylfp.com. Opting out of marketing does not stop necessary service or administrative communications.

13. Cookies and online technologies

Our websites and services may use cookies and similar technologies for essential functionality, preferences, analytics and - where permitted - marketing. Non-essential cookies are used in accordance with applicable consent requirements. Please see our Cookie Policy and on-site cookie controls for more detail.

14. Children and vulnerable people

Our general commercial services are primarily intended for adults. We do not knowingly seek personal information directly from children for independent use of our services. Where family planning legitimately involves information about a child, we aim to process only what is necessary and appropriate in the circumstances.

We also recognise that some people using our services may be vulnerable because of distress, bereavement, financial harm, disability or other circumstances. We aim to minimise unnecessary data collection and use appropriate care, safeguarding and accessibility measures.

15. Complaints about privacy

If you are unhappy with how we have handled your personal information, please contact us first so we can investigate and try to resolve the issue.

- Email: lf@epiphanylf.com
- Post: Epiphany LFP Ltd, Rowe Farm, Rowe Lane, Stanton Long, Much Wenlock, TF13 6LR, United Kingdom

You also have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection. Current contact and complaint information is available at ico.org.uk.

16. Links and third-party services

Our websites and tools may link to services operated by other organisations. Their privacy practices are outside our control. Please read the privacy information for any third-party website, AI platform, payment service, community platform or other service you use.

17. Changes to this notice

We review this Privacy Notice regularly and update it when our services, technology or legal obligations change. Material changes will be brought to attention through our website or other appropriate communications before new uses of personal information begin where required.

This version is effective from 26 August 2026 and replaces the August 2023 notice.

Contact

Epiphany LFP Ltd
Rowe Farm, Rowe Lane
Stanton Long
Much Wenlock
TF13 6LR

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