

2025

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# Privacy Policy

## **1. INTRODUCTION**

This Privacy Policy explains how Centraline IT Services ("Centraline", "we", "us", or "our"), registered at International House, 10 Churchill Way, Cardiff, CF10 2HE, United Kingdom, collects, uses, shares, and protects your personal information when you use our services, website, or otherwise interact with us.

We are committed to protecting your privacy and handling your data in an open and transparent manner. This policy is compliant with the UK Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), the EU General Data Protection Regulation (EU GDPR), and other applicable privacy laws in territories where we operate.

Please read this Privacy Policy carefully to understand our practices regarding your personal data.

## **2. DEFINITIONS**

"Personal Data" means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier.

"Processing" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means.

"Controller" means the natural or legal person which determines the purposes and means of the processing of personal data.

"Processor" means a natural or legal person which processes personal data on behalf of the controller.

"Third Party" means a natural or legal person, public authority, agency, or body other than the data subject, controller, processor, and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

"Consent" of the data subject means any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which they, by a statement or by a clear affirmative action, signify agreement to the processing of personal data relating to them.

### **3. DATA CONTROLLER**

Centraline IT Services acts as a data controller in relation to the personal data we collect and process about you. Our contact details are:

Centraline IT Services  
International House, 10 Churchill Way  
Cardiff, CF10 2HE  
United Kingdom

Email: [privacy@centraline.co.uk](mailto:privacy@centraline.co.uk)

## **4. INFORMATION WE COLLECT**

We may collect, use, store, and transfer different kinds of personal data about you, which we have grouped as follows:

### **4.1 Identity Data**

Includes first name, last name, username or similar identifier, title, job title, and company name.

### **4.2 Contact Data**

Includes billing address, delivery/site address, email address, and telephone numbers.

### **4.3 Financial Data**

Includes bank account details, payment card details (which are processed securely through our payment processors and are not stored by us).

### **4.4 Transaction Data**

Includes details about payments to and from you and other details of services you have purchased from us.

### **4.5 Technical Data**

Includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, System Information including sensitive system data collected during the course of our duties under contract and other technology on the devices you use to access our website.

### **4.6 Profile Data**

Includes your username and password, purchases or orders made by you, your preferences, feedback, and survey responses.

### **4.7 Usage Data**

Includes information about how you use our website and services.

### **4.8 Marketing and Communications Data**

Includes your preferences in receiving marketing from us and our third parties and your communication preferences.

### **4.9 Special Categories of Personal Data**

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## **5. HOW WE COLLECT YOUR PERSONAL DATA**

We use different methods to collect data from and about you, including:

### **5.1 Direct interactions**

You may give us your Identity, Contact, and Financial Data by filling in forms or by corresponding with us by post, phone, email, or otherwise. This includes personal data you provide when you:

- Request our services;
- Create an account on our website;
- Subscribe to our publications;
- Request marketing to be sent to you;
- Provide feedback or contact us.

### **5.2 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 personal data by using cookies, server logs, and other similar technologies. Please see our Cookie Policy section below for further details.

### **5.3 Third parties or publicly available sources**

We may receive personal data about you from various third parties and public sources, such as:

- Technical Data from analytics providers, advertising networks, and search information providers;
- Contact, Financial, and Transaction Data from providers of technical, payment, and delivery services;
- Identity and Contact Data from data brokers, aggregators, or public sources.

## 6. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

6.1 Where we need to perform the contract we are about to enter into or have entered into with you.

6.2 Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

6.3 Where we need to comply with a legal or regulatory obligation.

6.4 Where you have provided consent for a specific purpose.

6.5 Purposes for which we will use your personal data:

| Purpose/Activity                                                                                                                                         | Type of data                                                               | Lawful basis for processing                                                                                                                                                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To register you as a new client                                                                                                                          | Identity, Contact                                                          | Performance of a contract with you                                                                                                                                                              |
| To provide our services, including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us                                       | Identity, Contact, Financial, Transaction, Marketing and Communications    | Performance of a contract with you; Necessary for our legitimate interests (to recover debts due to us)                                                                                         |
| To manage our relationship with you, including: (a) Notifying you about changes to our terms or privacy policy (b) Asking you for feedback               | Identity, Contact, Profile, Marketing and Communications                   | Performance of a contract with you; Necessary to comply with a legal obligation; Necessary for our legitimate interests (to keep our records updated and to study how clients use our services) |
| To administer and protect our business and website (troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | Identity, Contact, Technical                                               | Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security); Necessary to comply with a legal obligation                   |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you             | Identity, Contact, Profile, Usage, Marketing and Communications, Technical | Necessary for our legitimate interests (to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy)                                      |
| To use data analytics to improve our website, services, marketing, customer relationships and experiences                                                | Technical, Usage                                                           | Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)  |
| To make suggestions and recommendations to you about services that may be of interest to you                                                             | Identity, Contact, Technical, Usage, Profile                               | Necessary for our legitimate interests (to develop our services and grow our business); Consent (where required by law for electronic marketing communications)                                 |

## **7. COOKIE POLICY**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

### **7.1 The cookies we use**

We use the following categories of cookies:

#### **7.1.1 Essential Cookies (Always Allowed)**

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. These include:

- Usercentrics CMP cookies – Used to manage your consent preferences for our website's cookies and data processing activities
- Stripe payment cookies – Necessary for processing payments securely
- Google Tag Manager cookies – Used to manage and deploy various tags (scripts) on our website
- unpkg cookies – Required for delivery of essential JavaScript packages
- Cloudflare security cookies – Used to identify trusted web traffic and provide security functions

#### **7.1.2 Marketing Cookies (Require Consent)**

These cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user. These include:

- Crisp Chat cookies (analytics only) – Used to analyse chat usage patterns (Note: Crisp Chat will load without analytics by default to retain live chat functionality)
- HotJar session cookies – Used to understand how visitors interact with our website by recording sessions
- Amplitude marketing cookies – Used to track user interactions to optimize marketing efforts

### 7.1.3 Statistics Cookies (Require Consent)

These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. These include:

- Google Analytics cookies – Used to collect information about how visitors use our website
- PostHog analytics cookies – Used to collect data on user behaviour and interactions
- User tracking cookies – Used to track visitor information and behaviour on the site

Cookies and their respective names/IDs are subject to change and this list cannot be guaranteed to be accurate. Our consent banner will serve accurate lists of cookies at that time and the above list is for reference use only.

### 7.2 Managing cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

When you first visit our website, we will inform you about our use of cookies and ask for your consent for those that require it. You can change your cookie preferences at any time by clicking on the "Cookie Settings" link in the footer of our website.

## **8. DISCLOSURES OF YOUR PERSONAL DATA**

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

### **8.1 Service Providers**

IT and system administration services, cloud service providers, payment processors, and other service providers who help us deliver our services.

### **8.2 Professional Advisers**

Lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance, and accounting services.

### **8.3 Regulatory Authorities and Law Enforcement**

Authorities who require reporting of processing activities in certain circumstances, tax authorities, and other authorities who may require reporting of processing activities in certain circumstances.

### **8.4 Third Parties**

We may share your personal data with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties 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 and only permit them to process your personal data for specified purposes and in accordance with our instructions.

**We will never sell your personal data for profit, and the sale of personal data is not within our business practice. Your personal data will always be secure and confidential.**

## **8.5 Law Enforcement and Regulatory Cooperation**

As mentioned in our Terms and Conditions, we routinely cooperate with law enforcement agencies and regulatory authorities and may disclose certain activities that we undertake as part of regulatory or other requirements. This may include sharing your personal data:

- As required by applicable law, regulation, or court order;
- To comply with any regulatory requirements;
- To assist in the prevention, detection, or investigation of crime;
- To protect the safety of our staff, customers, or the public; or
- To protect our rights, property, or safety, or the rights, property, or safety of others.

Where possible and permitted by law, we will notify you of any such disclosure.

## **9. INTERNATIONAL TRANSFERS**

We may transfer your personal data to countries outside the UK and European Economic Area (EEA) in the course of providing our services, particularly when dealing with cloud-based services and international clients or suppliers.

Whenever we transfer your personal data out of the UK or EEA, we ensure a similar degree of protection is afforded to it by implementing at least one of the following safeguards:

### **9.1 Adequacy Decisions**

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK or European Commission.

### **9.2 Standard Contractual Clauses**

Where we use providers based in countries without adequacy decisions, we may use specific contracts approved by the UK or European Commission which give personal data the same protection it has in the UK and Europe.

### **9.3 International Data Transfer Agreements**

Where required, we implement UK International Data Transfer Agreements (IDTAs) or other appropriate transfer mechanisms.

### **9.4 Third Country Specifics**

For transfers to the US, we ensure that our service providers are certified under the EU-US Data Privacy Framework or UK Extension to the EU-US Data Privacy Framework, where applicable.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK or EEA.

## **10. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **11. DATA RETENTION**

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

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

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.

## 12. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights may include:

- 12.1 The right to be informed

You have the right to be provided with clear, transparent, and easily understandable information about how we use your personal data and your rights.

- 12.2 The right of access

You have the right to obtain access to your personal data that we are processing and certain other information (similar to that provided in this Privacy Policy).

- 12.3 The right to rectification

You are entitled to have your personal data corrected if it is inaccurate or incomplete.

- 12.4 The right to erasure

This is also known as 'the right to be forgotten' and enables you to request the deletion or removal of your personal data where there is no compelling reason for us to keep using it.

- 12.5 The right to restrict processing

You have the right to 'block' or suppress further use of your personal data when we are assessing a request for rectification or as an alternative to erasure.

- 12.6 The right to data portability

You have the right to obtain and reuse your personal data in a structured, commonly used, and machine-readable format in certain circumstances.

- 12.7 The right to object

You have the right to object to certain types of processing, including processing for direct marketing (which we do only with your consent).

- 12.8 Rights in relation to automated decision making and profiling

You have the right not to be subject to a decision when it is based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you.

- 12.9 The right to withdraw consent

Where we rely on your consent to process your personal data, you have the right to withdraw that consent at any time.

- 12.10 The right to complain to a supervisory authority

You have the right to complain to a data protection authority about our collection and use of your personal data. In the UK, this is the Information Commissioner's Office (ICO). Contact details for the ICO can be found at [www.ico.org.uk](http://www.ico.org.uk).

**If you wish to exercise any of the rights set out above, please contact us using the contact details provided in this Privacy Policy.**

### **13. NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## **14. WHAT WE MAY NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## **15. TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **16. THIRD-PARTY LINKS**

Our website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## **17. CHANGES TO THE PRIVACY POLICY**

We keep our Privacy Policy under regular review. This version was last updated on 27th April 2025. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **18. HOW TO CONTACT US**

If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact us using the details set out below:

Centraline IT Services  
International House, 10 Churchill Way  
Cardiff, CF10 2HE  
United Kingdom

Email: [privacy@centraline.co.uk](mailto:privacy@centraline.co.uk)

## **19. ADDITIONAL INFORMATION FOR SPECIFIC JURISDICTIONS**

### **19.1 California Residents**

If you are a California resident, the California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA) provide you with specific rights regarding your personal information, including:

- The right to know about personal information collected, disclosed, or sold
- The right to request deletion of personal information
- The right to correct inaccurate personal information
- The right to opt-out of the sale or sharing of personal information
- The right to limit the use of sensitive personal information
- The right to non-discrimination for exercising your rights
- To exercise these rights, please contact us using the details provided in this Privacy Policy.

### **19.2 European Economic Area (EEA) Residents**

In addition to the rights outlined in Section 12, if the processing of your personal data is subject to the EU GDPR, you have the right to:

- Lodge a complaint with your local supervisory authority
- Object to direct marketing at any time
- Object to processing based on legitimate interests where your personal situation warrants such objection

### **19.3 Other Jurisdictions**

We comply with local data protection requirements in all jurisdictions where we operate, including but not limited to Australia (Privacy Act), Canada (PIPEDA), the United Arab Emirates (PDPL), and the Philippines (Data Privacy Act). Residents of these countries may have specific rights regarding their personal data.

# Privacy Policy

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## Centraline IT Services

International House, 10 Churchill Way, Cardiff, CF10 2HE, United Kingdom

Last updated: 27th April 2025