This notice explains how Communicate Technology Limited collects, uses, shares, retains and protects personal data. It also explains the choices and rights available to individuals.

WHO WE ARE

Communicate Technology Limited ("Communicate Technology", "we", "us" or "our") is the data controller responsible for deciding how and why the personal data covered by this notice is processed.

Registered office: Wynyard Park House, Wynyard Park, Billingham, Teesside, TS22 5TB.

Data Protection Lead: DPO@communicate.technology | Telephone: 0800 404 8888

SCOPE OF THIS NOTICE

This notice applies to:

- visitors to our website;
- prospective and existing customers;
- customer and supplier contacts;
- people who contact us or request information about our services;
- attendees at events, webinars and other business activities; and
- other business contacts whose personal data we process.

A separate privacy notice applies to employees, workers and job applicants. Additional privacy information may also be provided when personal data is collected for a specific purpose.

Our website and services are intended for business users and are not directed at children. We do not knowingly collect personal data relating to children through the website.

HOW WE OBTAIN YOUR PERSONAL DATA

We may obtain personal data:

- directly from you when you use our website, complete a form, contact us, request information, purchase or use our services, attend an event or communicate with us;
- from your employer, colleagues or other business contacts;
- automatically through cookies, server logs and similar technologies;
- from customers, suppliers, partners, event organisers and professional advisers;
- from approved business information, credit-reference, business-contact and data-enrichment providers, including Apollo.io;
- from publicly available business sources, including company websites, professional networking platforms and Companies House; and
- from service providers supporting our business operations.

Website information may be processed through Webflow, Google Analytics, Lead Forensics, CookieYes and Zoho CRM, depending on how you use the website and the cookie choices you make.

Where we obtain personal data from another source, we provide the required privacy information within the period required by applicable data protection law, unless an exemption applies. Our External Business Contacts Privacy Statement provides further information about personal data obtained indirectly.

If you provide personal data about another person, you should ensure that you are authorised to provide it and, where appropriate, make this notice available to them. You should not provide another person's personal data to us unlawfully.

PERSONAL DATA WE COLLECT

- **Identity Data:** name, title, username or similar identifier.
- **Contact Data:** business or personal contact details, billing or delivery address, email address and telephone number.
- **Financial Data:** bank account and payment details where required.
- **Transaction Data:** details of payments, purchases, services and related activity.
- **Technical Data:** IP address, browser and device information, operating system, time zone, approximate location and related technical information.
- **Profile Data:** interests, preferences, feedback, survey responses and relevant business profile information.
- **Usage Data:** information about how you use our website, products and services.
- **Marketing and Communications Data:** marketing preferences, communication preferences and records of relevant communications.

We do not intentionally request or collect special-category personal data or criminal-offence information through our website. Please do not include this information in website forms or general enquiries. If it is provided unexpectedly, we will assess whether it is necessary and lawful to retain it and will delete it securely where it is not required.

Where information is required by law or under a contract and is not provided, we may be unable to provide the relevant product or service. We will explain this at the time where applicable.

HOW WE USE YOUR PERSONAL DATA

We only process personal data where an applicable lawful basis is available. The table below summarises our principal processing activities.

Purpose	Information	Lawful basis
Operate and protect our business, systems and website	Identity, Contact, Technical, Usage	Legitimate interests in operating a secure and effective business; compliance with legal obligations where applicable.
Respond to enquiries and manage prospective customer relationships	Identity, Contact, Profile, Technical, Usage	Steps requested before entering into a contract; legitimate interests in responding to enquiries and developing our business.
Register customers and provide products or services	Identity, Contact, Financial, Transaction	Performance of a contract; legitimate interests in recovering sums due; legal obligations where applicable.
Manage customer, supplier and partner relationships	Identity, Contact, Profile, Transaction, Marketing and Communications	Performance of a contract; legal obligations; legitimate interests in administering and improving business relationships.
Measure and improve our website and services	Technical, Usage	Consent for non-essential analytics technologies; legitimate interests in analysing lawfully collected and aggregated performance information.
Identify business-level website interest using Lead Forensics	Technical, Usage	Consent where non-essential storage or access technologies are used; legitimate interests in understanding business interest and developing our services.
Send relevant business-to-business communications	Identity, Contact, Profile, Marketing and Communications	Legitimate interests in developing our business and communicating with relevant professional contacts; consent where required by electronic marketing rules.
Manage events, webinars, surveys and requested content	Identity, Contact, Profile, Usage, Marketing and Communications	Performance of a contract where applicable; consent where required; legitimate interests in delivering and evaluating business activities.
Meet legal, regulatory, audit and security requirements	Relevant information depending on the requirement	Compliance with legal obligations; legitimate interests in governance, assurance, fraud prevention and protecting legal rights.

MARKETING AND PROFILING

We may use Identity, Contact, Profile, Usage and Marketing and Communications Data to identify services, content or events that may be relevant to a professional role or organisation.

We may send marketing where consent has been provided or where another lawful basis permits it. We also comply with applicable electronic marketing laws. You may object to direct marketing at any time by using the unsubscribe option in a communication or by contacting DPO@communicate.technology.

Opting out of marketing does not prevent us from sending necessary service, security, contractual or other non-marketing communications.

We do not share personal data with third parties for their own marketing without the required permission or other lawful authority.

AUTOMATED DECISION MAKING

We do not make decisions about individuals based solely on automated processing, including profiling, where those decisions produce legal or similarly significant effects.

We may use systems to organise, prioritise or provide insights about business contacts, enquiries and website activity. These tools support human decision-making.

SHARING PERSONAL DATA

Where necessary and appropriate, we may share personal data with:

- website hosting, cloud, consent-management, analytics, CRM, communications and other IT service providers;
- business-information and data-quality providers;
- customers, suppliers and delivery partners where necessary to provide or receive services;
- professional advisers, including legal advisers, auditors, insurers and accountants;
- regulators, law-enforcement bodies, courts, tax authorities and other public authorities; and
- potential purchasers, investors, lenders and advisers in connection with a proposed sale, acquisition, financing or reorganisation.

Where an organisation processes personal data on our behalf, we require it to process the information only for authorised purposes and maintain appropriate security and confidentiality. Where a recipient acts as an independent data controller, it is responsible for its own compliance with applicable data protection law.

INTERNATIONAL TRANSFERS

Some of the service providers we use operate internationally. As a result, personal data may be processed in or accessed from countries outside the United Kingdom.

Where personal data is subject to a restricted international transfer, we take steps to ensure that an appropriate transfer mechanism and safeguard is in place in accordance with applicable data protection laws.

Further information about the safeguards used for a particular transfer can be requested from our Data Protection Lead at DPO@communicate.technology.

DATA SECURITY

We maintain appropriate technical and organisational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

Access to personal data is restricted according to business need and appropriate authorisation. Employees, contractors and service providers that process personal data are subject to appropriate security and confidentiality obligations.

We maintain procedures for identifying, assessing, containing, investigating and responding to suspected personal data breaches. Where required by law, we will notify the ICO and affected individuals.

COOKIES AND SIMILAR TECHNOLOGIES

Our website uses cookies and similar technologies. A cookie is a small text file placed on a computer, smartphone or other device when a website is visited. Cookies can support requested functions, remember preferences and help us understand website use.

When you first visit our website, CookieYes gives you the option to Customise, Reject All or Accept All non-essential cookies. Necessary cookies may operate because they are required to provide the website, maintain security or record your privacy choices. Non-essential cookies are used only after the required consent has been provided.

COOKIE CATEGORIES

- **Necessary:** support secure operation, core website functionality and the recording of privacy choices.
- **Analytics:** help us understand how visitors find, navigate and use the website so we can measure and improve performance.
- **Functional:** support additional website features and remember choices made by visitors.

An advertising category should only be presented if advertising or retargeting technologies are actually deployed and identified by the production cookie scan.

COOKIE INVENTORY

Name	Domain	Category	Purpose	Duration	Party
X-CSRF-TOKEN	aplo-evnt.com	Necessary	This cookie, set by Apollo.io's tracking script, helps keep our website secure, protecting against unauthorised actions being submitted on your behalf while you browse our site. This cookie is essential for the website to function securely and does not collect any personal information.	Session	Third
_cf_bm	.apollo.io	Necessary	This cookie, set by Cloudflare, is used to support Cloudflare Bot Management.	1 hour	Third
rc::a	google.com	Necessary	This cookie is set by the Google recaptcha service to identify bots to protect the website against malicious spam attacks.	Never expires	Third
_cfuvid	communicate.technology	Necessary	Cloudflare sets this cookie to track users across sessions to optimize user experience by maintaining session consistency and providing personalized services.	Session	First
cookieyes-*	communicate.technology	Necessary	CookieYes sets this cookie for consent solution management.	1 year	First
rc::c	www.google.com	Necessary	This cookie is set by the Google recaptcha service to identify bots to protect the website against malicious spam attacks.	Session	Third
_GRECAPTCHA	www.google.com	Necessary	Google Recaptcha service sets this cookie to identify bots to protect the website against malicious spam attacks.	6 months	Third

Name	Domain	Category	Purpose	Duration	Party
_leadgenie_session	aplo-event.com	Analytics	This cookie, set by Apollo.io, is used to recognise visitors to our website so we can better tailor our outreach and improve our services. The cookie is temporary and expires when you close your browser.	Session	Third
_ga_*	.communicate.technology	Analytics	Google Analytics sets this cookie to store and count page views.	1 year 1 month 4 days	First
_ga	.communicate.technology	Analytics	Google Analytics sets this cookie to calculate visitor, session and campaign data and track site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognise unique visitors.	1 year 1 month 4 days	First
lfuuid	communicate.technology	Analytics	This cookie is used to store information on user preferences, to provide offers that are targeted to individual interests.	1 year	First

MANAGING COOKIE PREFERENCES

You can review, change or withdraw your choices at any time using the cookie settings control or cookie icon available on the website. Your revised choice applies to future use of non-essential cookies on your device. Withdrawing consent does not affect the lawfulness of processing carried out before withdrawal.

You can also configure your browser to block or delete cookies. Blocking necessary cookies may affect website operation.

DATA RETENTION

We retain personal data only for as long as reasonably necessary for the purpose for which it was collected, including legal, regulatory, tax, accounting, contractual, security and reporting requirements.

Record or activity	Standard retention approach
Website enquiries that do not progress	Up to 12 months after closure
Prospective customer and business-contact information	Up to 24 months after the last meaningful interaction, unless an active relationship justifies longer retention
Customer relationship records	For the relationship and normally six years afterwards
Supplier relationship records	For the relationship and normally six years afterwards
Google Analytics user-level and event-level data	14 months

Cookie-consent records	5 years
Marketing objections and unsubscribe records	As long as necessary in a restricted suppression list to respect the preference

When determining a retention period, we consider the amount, nature and sensitivity of the information, the purposes of processing, legal and contractual requirements and the risk arising from unauthorised use or disclosure.

Information may be retained for longer where necessary for an actual or reasonably anticipated legal claim, complaint, regulatory matter, security investigation or contractual dispute. At the end of the applicable period, personal data will be securely deleted, anonymised or placed beyond operational use.

YOUR RIGHTS

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

- be informed about the collection and use of your personal data;
- request access to your personal data;
- request correction of inaccurate or incomplete information;
- request deletion of your personal data in certain circumstances;
- request restriction of processing of your personal data in certain circumstances;
- object to processing based on legitimate interests;
- object to direct marketing at any time;
- request data portability where applicable;
- withdraw consent where processing is based on consent; and
- complain to the Information Commissioner's Office.

These rights are subject to conditions and exemptions under data protection law. To exercise a right, contact DPO@communicate.technology or telephone 0800 404 8888. We may request information reasonably necessary to verify your identity and understand your request.

You will not normally have to pay a fee. Where permitted by law, we may charge a reasonable fee or decline to act if a request is manifestly unfounded or excessive. We will respond within the applicable legal period and will inform you if a permitted extension is necessary.

COMPLAINTS

If you have a concern about how we process personal data, please contact our Data Protection Lead at DPO@communicate.technology. We will investigate the concern under our applicable procedures.

You also have the right to complain directly to the Information Commissioner's Office. You are not required to contact us before approaching the ICO.

CHANGES TO THIS NOTICE

We review this notice regularly and update it when our processing activities, suppliers or legal obligations change. Where a change materially affects how we use personal data, we will take reasonable steps to bring it to the attention of affected individuals before the new processing begins.

It is important that the personal data we hold is accurate and current. Please tell us if your information changes during your relationship with us.