

Privacy Policy (Version 2.0)

Created Date	9 th September 2026
Last Reviewed	9 th September 2026
Next Review Due	1 st January 2027
Staff	Imogen Payne

1. Who we are

Evoxta Business Solutions provides business solutions, IT support, web hosting and related services.

In this policy, “Evoxta”, “we”, “us” and “our” refers to **Evoxta Business Solutions**.

Privacy contact: privacy@evoxta.com

Website: www.evoxta.com

We are the data controller for personal information we use to manage our business, website, enquiries and customer relationships.

This policy explains how we handle that information under applicable UK data protection law, including the UK GDPR and Data Protection Act 2018, as amended.

2. Who this policy covers

This policy covers:

- Visitors to our website;
- People who enquire about or purchase our services;
- Employees and representatives of our business customers;
- Suppliers, contractors and business contacts; and
- People who contact us or receive our marketing.

When we host or access personal information on behalf of a customer, we generally act as a data processor. Section 12 explains that distinction.

3. Personal information we collect

Depending on your relationship with us, we may collect:

Contact and business information: your name, business name, job title, email address, telephone number and correspondence address.

Account and service information: account details, services purchased, quotations, orders, instructions, preferences and service history.

Billing information: billing contacts, invoice details, payment status and transaction references

Communications and support information: enquiries, emails, support tickets, feedback and information supplied during troubleshooting.

Technical information: IP addresses, browser and device details, operating system information, access times, security events and relevant website or service logs.

Marketing preferences: subscriptions, consent records, objections and unsubscribe requests.

Information accessed during support: system details, configuration records, screenshots, diagnostic information and, where necessary, information contained in customer systems.

We aim to collect only information needed for the relevant purpose. Please do not send passwords, special-category information or other sensitive information through ordinary enquiry forms or email. Where such information is needed, we will agree an appropriate method.

4. How we obtain information

We obtain personal information:

- Directly from you when you contact us, request a quotation, enter into an agreement or use our services;
- From your employer or organisation when it appoints you as a contact or requests support;
- Automatically through relevant website, service and security technologies; and

Where information comes from another source, we will provide the privacy information required by law within the applicable timeframe, unless a lawful exception applies.

5. Why we use information and our lawful bases

We identify a lawful basis for each purpose.

Purpose	Lawful basis
Responding to enquiries and preparing quotations	Taking steps at your request before entering a contract with you; or legitimate interests in responding to business enquiries where you represent an organisation
Delivering services and managing your account	Performing our contract with you; or legitimate interests in delivering services to your organisation

Providing support and resolving technical problems	Contract where you are the contracting individual; otherwise legitimate interests in supporting customers and maintaining services
Billing, collecting payments and keeping accounting records	Contract, legitimate interests in managing payments, and legal obligations where applicable
Protecting systems, preventing misuse and investigating security incidents	Legitimate interests in protecting our business, customers and services; legal obligations where applicable
Handling complaints and establishing, exercising or defending legal claims	Legitimate interests in resolving disputes and protecting legal rights; legal obligations where applicable
Sending marketing	Consent where required, or legitimate interests where legally permitted, subject to electronic marketing rules
Using optional website technologies that require consent	Consent

Where we rely on legitimate interests, we assess whether our interests are balanced against your rights and reasonable expectations.

We use a legal obligation as a basis only where a relevant law requires the processing. You may contact us for further information about the basis for a particular use.

Where special-category information is involved, we must also identify an applicable additional condition before processing it as a controller.

6. Information you need to provide

Some information is necessary to prepare a quotation, enter into a contract, provide support or meet legal obligations.

If you do not provide required information, we may be unable to deliver the requested service. We will explain which information is required and the likely consequences when we collect it.

Providing information for optional marketing is voluntary.

7. Marketing

We may send information about our services where permitted by law.

Where consent is required for email, text or similar marketing, we will obtain it unless a valid legal exception applies. Sole traders and certain partnerships receive additional protection under electronic marketing rules.

Where permitted, we may contact relevant corporate business contacts using our legitimate interests in promoting our services.

You can unsubscribe using the link in a marketing message or by contacting **privacy@evoxta.com**. You have an absolute right to object to the use of your personal information for direct marketing.

We may retain limited information on a suppression list to respect your preferences.

Essential service messages, such as invoices, security alerts and renewal notices, may still be sent where necessary.

8. Cookies and similar technologies

Our public-facing website does not use cookies.

Clients will receive a cookie policy for client portals and confidential client areas if they require it.

9. Who we share information with

Where necessary for the purposes described in this policy, we may share information with:

- Hosting, infrastructure and cloud service providers;
- Email, communications and support platform providers;
- Payment processors, banks and accounting providers;
- IT security, backup and technical service providers;
- Professional advisers, insurers and auditors;
- Authorities, regulators or law enforcement bodies where legally required or otherwise lawfully justified; and
- Parties involved in a proposed business sale or restructuring, subject to appropriate safeguards.

We limit disclosure to what is necessary and use appropriate contractual protections.

Providers processing information on our behalf must act under our instructions and applicable data protection obligations. Some recipients, such as banks or professional advisers, may act as independent controllers.

10. International transfers

Some providers may store or access personal information outside the United Kingdom.

Our relevant processing locations and transfer arrangements are:

Germany

Where a restricted transfer occurs, we ensure a lawful transfer mechanism applies. Depending on the circumstances, this may include UK adequacy regulations or appropriate safeguards such as the UK International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses.

We also carry out any required assessment and apply supplementary safeguards where necessary.

You can contact us for information about the safeguards relevant to your information and how to obtain a copy, subject to appropriate redactions.

11. How long we keep information

We keep personal information only for as long as necessary for its purpose, taking account of legal requirements, security needs and relevant limitation periods.

Our retention periods are:

Record type	Retention period or criteria
Enquiries that do not become customers	60 days
Customer account and contract records	365 days We keep this data for potential customer data enquiries
Support tickets and diagnostic records	365 days
Website and security logs	0 days
Marketing suppression records	For as long as reasonably necessary to respect the objection
Backups	Backups are every 7 days Old backups are deleted after 90 days

We may retain relevant information longer where necessary for an ongoing dispute, investigation or legal obligation.

At the end of its retention period, information is securely deleted or anonymised.
Information awaiting expiry in backups is protected and restricted from ordinary use.

12. Customer information processed through our services

When customers use our hosting, IT support or other services, we may process personal information on their behalf.

In those circumstances:

- The customer generally determines why and how the information is used;
- We process it under documented instructions and our contractual data processing terms;
- The customer's privacy notice explains its use of that information; and
- Return, deletion, approved sub-processors and security arrangements are governed by the applicable service agreement.

If your information is held on a website or system operated by one of our customers, you should normally direct privacy requests to that customer. If we receive a relevant request, we will assist or refer it to the customer as appropriate.

We may separately act as controller for our own account administration, billing and legally required records.

13. How we protect information

We use technical and organisational measures appropriate to the nature of the information and the risks involved.

Our measures include: restricted access, multi-factor authentication, encryption, security updates, confidentiality controls and tested recovery arrangements.

Access is limited to people who need information for an authorised purpose.

No system can be guaranteed completely secure. Where a personal data breach occurs, we will assess it and notify affected customers, individuals and the regulator where legally required.

14. Your rights

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

- Obtain access to your personal information;
- Correct inaccurate or incomplete information;
- Request deletion;

- Restrict how information is used;
- Receive certain information in a portable format;
- Object to processing based on legitimate interests; and
- Withdraw consent where processing relies on consent.

Withdrawal does not affect the lawfulness of processing carried out before withdrawal.

You can object to direct marketing at any time.

Some rights are subject to legal conditions and exemptions. To exercise a right, contact **privacy@evoxta.com**

We normally respond without undue delay and within one month, subject to lawful extensions or adjustments. If an extension applies, we will explain it.

We may request proportionate information to verify your identity. Requests are normally free; any lawful fee or refusal will be explained.

15. Automated decisions

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

If this changes, we will provide the information and safeguards required by law before carrying out that processing.

16. Children's information

Our services are directed at businesses and are not intended to solicit personal information directly from children.

Customers may hold children's information within their own systems. Where we process that information on their behalf, our processor obligations and the agreed safeguards apply.

If you believe a child has provided information directly to us inappropriately, please contact **child-protection@evoxta.com**

17. Complaints

If you have a concern about our use of personal information, please contact:

Email: privacy@evoxta.com

We will investigate and explain our response.

18. Other websites

Our website may link to third-party websites. Their privacy notices explain how they handle personal information. We recommend reviewing those notices before providing information.

19. Changes to this policy

We may update this policy to reflect changes in our services, practices or legal requirements.

The latest version will appear on our website with its updated date. Where required, we will bring significant changes to your attention and obtain consent before introducing processing that requires it.

Warm regards,



Imogen Payne
Operations Manager
ipayne@evoxta.com