Policy Name: Privacy Policy

Policy Reference: GRC-POL-008

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Owner: Jack Garratt

Revision History:

Revision No.	Date	Summary of changes	Reviewer
v007	06/02/24	Merged into new format, pending changes by new external DPO .	Jack Garratt
V7.0.1	10/06/25	Updated version control and revised job title.	Chloe Buchanan
v008	24/06/26	General review and update.	Alexandra Carragher

1. Introduction

TIEVA Limited trading as Pure Data Solutions Limited, Servatech Limited and Prodec Networks Limited ('TIEVA') respects your privacy and is committed to protecting it through compliance with this Privacy Policy and applicable data protection laws, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Privacy and Electronic Communications Regulations 2003 (PECR).

This Privacy Policy explains how we collect, use, store, and share your personal information when you use our services as an IT reseller, managed service provider (MSP), or private cloud infrastructure provider. It also applies to data collected through our website and other interactions with TIEVA.

We process personal data across a range of business activities including service delivery, customer account management, recruitment, supplier relationships, IT operations and security, analytics, and marketing.

Scope

This Privacy Policy applies to personal data collected and processed by TIEVA in connection with our website, products, services and business activities. It explains how we collect, use, store, share, and protect personal information, and outlines the rights available to individuals under applicable data protection laws.

2. Definitions

- Personal Data - Any information that identifies an individual, directly or indirectly.
- Data Controller - The entity that determines the purposes and means of processing personal data. TIEVA acts as the Data Controller when we collect and use personal data for our own purposes.
- Data Processor - The entity that processes personal data on behalf of the Data Controller. TIEVA acts as a Data Processor when we handle data on behalf of our clients, such as during managed services or private cloud hosting scenarios.
- Special Categories of Data - Sensitive data such as racial or ethnic origin, political opinions, religious beliefs, health information, and data concerning a person's sex life or sexual orientation.

3. The Data We Collect

TIEVA collects various types of personal data depending on how you interact with us. This includes:

- Identity Data - First name, last name, job title, and company details.
- Contact Data - Billing address, email address, and telephone numbers.

- Financial Data - Bank account and payment details for processing transactions.
- Transaction Data - Details of services purchased or used, including order history and payment information.
- Technical Data - IP address, login data, browser type, time zone setting, location, and device information collected when you use our website or services.
- Usage Data - Information about how you use our services, including private cloud services and IT support.
- Marketing and Communications Data - Preferences in receiving marketing from us and your communication preferences.
- Authentication Data – Account credentials and access logs
- Operational Data – System activity, support tickets and service records
- Profile and Preference Data – Service choices, preferences and optional information.

We may also collect limited information relating to your interactions with our systems and services, such as account access information or service usage, where necessary to support service delivery and security.

Our products and services are not specifically directed towards children under the age of 13, and we do not knowingly collect personal data directly from children through our website or marketing activities.

However, as an IT reseller, managed service provider and private cloud infrastructure provider, we may process personal data on behalf of our customers, including data relating to children, where such data is contained within customer systems or services that we host, manage or support. In these circumstances, we act as a data processor and process personal data only in accordance with our customers' instructions.

4. How We Collect Data

We collect data from you in several ways:

- Directly - When you provide data by filling in forms, contacting us, or purchasing our services.
- Automatically - Through cookies and similar technologies as you interact with our website. For more details, refer to our Cookie Policy.
- Third Parties - From analytics providers, business partners, publicly available sources or trusted data providers.

5. How We Use Your Data

We use your data in compliance with data protection laws. The main purposes for processing your personal data include:

- Service Provision - To register you as a customer, provide our services (such as managed IT services, private cloud infrastructure, or hardware resale), process orders, and provide technical support.
- Sales and Order Management – To process quotes, orders, deliveries and transactions.
- Customer Relationship Management – To send communications, support account management and general customer support.Payment Processing – Billing and financial administration
- Marketing and Promotions – Sending relevant communications where permitted.
- Security and Protection – Maintaining the security of our services and systems.
- Legal Compliance – Meeting legal and regulatory requirements
- Business Operations – Reporting, analytics, and service improvement

6. Use of Systems and Security

We may process technical and usage information to help maintain the security, performance, and reliability of our services. This included detecting security risks, resolving issues and ensuring systems operate effectively.

7. Legal Basis for Processing Personal Data

We rely on different legal bases for processing your personal data depending on the context:

- Performance of a Contract - When processing your data is necessary to fulfil a contract, such as providing IT services or handling your purchases.
- Legitimate Interests - When processing is in our legitimate interests, such as improving our services, provided this does not override your rights.
- Consent - When you have provided consent, such as for receiving marketing communications.
- Legal Obligations - When processing is necessary to comply with legal obligations, such as responding to law enforcement requests.

  We ensure all processing activities are supported by an appropriate lawful basis.

8. Special Categories of Data

We do not routinely process special categories of personal data. However, in limited circumstances, such as in relation to employment, accessibility requirements, or where information is voluntarily provided, this may occur.

If processed, it will be based on:

- Explicit Consent - Where you have explicitly consented to the processing of this data.
- Employment Law Requirements - To comply with employment law or obligations relating to health and safety.
- Vital Interests - To protect the vital interests of the data subject where consent cannot be given.

We apply appropriate safeguards, including restricted access and enhanced security protections.

9. Data Stored on Our Private Cloud (TIEVA Cloud)

TIEVA operates a private cloud infrastructure to host customer data. When acting as a data processor, we host, and process customer data based on their instructions. Our cloud infrastructure is housed in UK-based data centres with robust security measures, including encryption and access controls, ensuring that hosted data is stored and managed securely. TIEVA is certified to Cyber Essentials + and ISO 27001 standards for information security management.

For customers using our cloud services, they remain the data controller, determining the purpose of data use, while TIEVA processes data strictly in accordance with their instructions.

We provide Data Processing Agreements (DPAs) outlining responsibilities and compliance requirements.

10. Sharing Your Data

We may share your personal data with the following parties:

- Service Providers - Third-party companies that provide services such as, but not limited to distributors, service and warranty providers. We may share sales data with suppliers to maintain accreditations.
- IT, cloud, and business systems providers.
- Regulatory Bodies and Law Enforcement - Where required by law, we may disclose data to regulatory authorities or law enforcement agencies.
- Business Transfers - In the event of a merger, acquisition, or sale of assets, your data may be transferred to the new owners.

All third parties are subject to appropriate contractual and confidentiality obligations.

11. Joint Controllers

Where we act as a joint controller, we will have agreements in place to define responsibilities and ensure compliance.

12. Data Breach Reporting

ICO Registration:
TIEVA Ltd: ZB188746
Pure Data Solutions Ltd: ZA2587
Servatech Ltd: ZA259080
Prodec Networks Ltd: ZA286008

We maintain processes to identify, manage and respond to data breaches. Where required we will notify the ICO within 72 hours and affected individuals in line with our legal obligations.

13. International Transfers

TIEVA primarily stores and processes data within the United Kingdom and EU. However, some services may involve processing outside the UK.

Where this occurs, we ensure appropriate safeguards are in place, such as approved contractual protections and other lawful mechanisms.

14. Data Security

We implement appropriate technical and organisational measures to protect personal data, including secure access controls and encryption where appropriate.

We regularly review our security practices to ensure ongoing protection of personal data.

15. Use of Technology

We may use modern technologies, including automated tools, to support business operations and improve our services. We ensure personal data is handled responsibly and in line with this Privacy Policy.

16. Data Retention

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected and to meet legal or regulatory requirements.

Typical retention periods include:

- Customer and financial records: 7 years for legal obligations (where required)
- Marketing data: 2 years from last meaningful interaction, unless renewed engagement occurs or consent or withdrawn.

16. Your Rights

You have several rights under data protection law, including:

- Right to Access - You may request access to your personal data and a copy of the information we hold about you.
- Right to Rectification - You can request corrections to any inaccuracies in your data.

- **Right to Erasure -** Under certain circumstances, you can request that your data be deleted.
- **Right to Restrict Processing -** You may ask us to restrict the processing of your data in specific situations.
- **Right to Data Portability -** You can request a copy of your data in a machine-readable format or have it transferred to another data controller.
- **Right to Object -** You can object to the processing of your data for direct marketing or in other scenarios where we rely on legitimate interests.
- **Right to Withdraw Consent -** Where processing is based on consent, you may withdraw this at any time.

Please contact us to exercise these rights at privacy@tieva.co.uk. We encourage you to contact us, to ensure we can resolve any concerns.

17. Automated Decision-Making and Profiling

We do not use automated decision-making that has legal or significant effects on individuals.

18. Marketing Preferences

You can opt-in or out of marketing communications at any time by following the unsubscribe instructions or contacting us.

19. Cookies and Online Tracking

We use cookies to improve website functionality and understand usage. You can manage cookie settings via your browser.

20. Third-Party Links

Our website may contain links to third-party websites. We are not responsible for the privacy practices of these websites, and we encourage you to review their privacy policies.

21. Changes to This Privacy Policy

We review this privacy policy at least annually.

22. Contact Us

If you have any questions about this Privacy Policy or our data practices, contact us:

TIEVA
The Mill II
Holly Park Mills,
Calverley
Leeds

ICO Registration:
TIEVA Ltd: ZB188746
Pure Data Solutions Ltd: ZA2587
Servatech Ltd: ZA259080
Prodec Networks Ltd: ZA286008

LS28 5QS

Email: privacy@tieva.co.uk
Phone: +44 (0) 333 043 0333

You also have the right to lodge a complaint with the **Information Commissioner's Office (ICO)** if you believe we have not complied with data protection laws.

ICO Registration:
TIEVA Ltd: ZB188746
Pure Data Solutions Ltd: ZA2587
Servatech Ltd: ZA259080
Prodec Networks Ltd: ZA286008