



Cirrom

Data Privacy Policy

Version 1.0

PURPOSE

Cirrom Ltd (herein referred to as "Organization," "Company," "we," "our," or "us," etc.) is committed to protecting the privacy of individuals who interact with us. This policy explains how we collect, use, store, and safeguard personal data to ensure transparency and build trust with our users, customers, and partners.

SCOPE

This policy applies to all personal data collected through the organization's websites, applications, services, and other interactions with individuals.

DEFINITION

- **IP Address:** A unique string of characters that identifies each computer using the Internet Protocol to communicate over a network.
- **Personal Data:** Any information relating to an identifiable individual (e.g., name, email, IP address).
- **Processing:** Any operation performed on personal data, such as collection, storage, use, disclosure, or deletion.
- **Data Controller:** The entity that determines the purposes and means of processing personal data.
- **Data Processor:** The entity that processes data on behalf of the data controller.

RESPONSIBILITIES

- Chris Pigden, CTO is responsible for developing, implementing, maintaining, and enforcing the policy.
- Employees are responsible and/or accountable to ensure adherence to this policy's terms during their job duties.

POLICY

Data We Collect

We may collect the following types of personal data:

- **Identification Information:** Name, email, telephone, company and address details
- **Financial Information:** Payment details, billing address.
- **Technical Data:** Usage analytics.

How We Use Collect Data

We collect personal data through the following methods:

- **Directly from you:** When you fill out forms, email, or contact us.
- **Automatically:** Through cookies, analytics tools, and logs when you use our website or services.
- **Third Parties:** From business partners, service providers, or publicly available sources.

Legal Bases for Processing Personal Data

We process personal data only when permitted by law. The legal bases include:

- **Consent:** When you provide explicit consent (e.g., marketing communications).
- **Contractual Necessity:** To fulfill a contract with you (e.g., processing orders).
- **Legal Obligation:** To comply with legal and regulatory requirements.
- **Legitimate Interests:** For fraud prevention, improving services, or ensuring security.

How We Use Personal Data

We use personal data for the following purposes:

- Providing and improving our services.
- Processing transactions and managing accounts.
- Communicating with you regarding updates, offers, and support.
- Conducting analytics and research to improve user experience.
- Ensure security, detect fraud, and comply with legal obligations.

Data Sharing and Disclosure

We may share personal data under these circumstances:

- **Service Providers:** With vendors or contractors who perform services on our behalf.
- **Legal Compliance:** To comply with laws, subpoenas, or other legal processes.
- **Business Transfers:** In the event of mergers, acquisitions, or asset sales.
- **Consent:** When you explicitly agree to share your data.

Data Retention

We retain personal data only as long as necessary to fulfill the purposes for which it was collected unless a more extended retention period is required by law. Afterward, data is securely deleted or anonymized.

Data Security

We implement industry-standard technical and organizational measures to safeguard personal data, including:

- Encryption (at rest and in transit).
- Access controls and authentication protocols.
- Regular audits and security assessments.

Your Rights

Depending on your jurisdiction, you may have the following rights:

- **Access:** Request access to your data.
- **Rectification:** Correct inaccurate or incomplete data.
- **Deletion:** Request deletion of your data.
- **Data Portability:** Obtain a copy of your data in a portable format.
- **Restriction:** Request a limitation on the processing of your data.
- **Objection:** Object to certain processing activities (e.g., direct marketing).
- **Withdraw Consent:** Withdraw your consent when processing is based on consent.

To exercise your rights, please contact us at robin.stephens@cirrom.com.

Cookies and Tracking Technologies

We use cookies and other tracking technologies to enhance your browsing experience. You can manage your preferences through our cookie policy or browser settings.

Children's Privacy

We do not knowingly collect personal data from children. If we become aware of such data, we will delete it promptly.

Third-Party Links

Our website or services may contain links to third-party websites. We are not responsible for their privacy practices and encourage you to review their privacy policies.

Updates to This Policy

We may update this policy periodically to reflect changes in laws, regulations, or business practices.

Version Details

Version	Version Date	Description of changes	Created By	Approved By	Published By
Version 1.0	Oct 23 2025	Initial Release	Robin Stephens	Robin Stephens	Robin Stephens