



November 2025

1. Introduction

Primary Technology is a UK-based Managed Services Provider, offering IT support, cloud services, cyber security, and communications. We are committed to protecting your privacy and handling your personal data transparently and securely, in line with the latest UK data protection laws, including the Data (Use and Access) Act 2025 (DUAA), UK GDPR, Data Protection Act 2018, and the Privacy and Electronic Communications Regulations (PECR).

This Privacy Notice explains how we collect, use, share, and protect your personal data. It should be read alongside our other policies, available at:

<https://primaryt.co.uk/policies>

2. Scope

You have the following rights regarding your personal data:

- Access: To obtain a copy of your data and supplementary information (subject to a reasonable and proportionate search)
- Rectification: To correct inaccurate or incomplete data
- Erasure: To request deletion of your data in certain circumstances ("right to be forgotten")
- Restriction: To request restriction of processing in certain cases
- Portability: To receive your data in a portable format
- Objection: To object to processing, including direct marketing
- Automated decision-making: To object to and seek human intervention in automated decisions that have legal or significant effects
- Complaint: To lodge a complaint with the Information Commissioner's Office (ICO)

To exercise your rights, contact our Data Protection Officer (see Section 9).

3. Legal Bases for Processing

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to access the personal data and other supplementary information that we hold about you.
- Right of rectification – you have a right to have inaccurate personal data rectified or completed.
- Right to erasure – in certain circumstances, you have the 'right to be forgotten' and for your personal data to be erased.
- Right to restrict processing – where certain conditions apply, you have the right request the restriction of your personal data.
- Right to data portability – you have the right to obtain and reuse the personal data we hold about you.
- Right to object – in certain circumstances, you have the right to object to the processing of your personal data.
- Rights related to automated decision making including profiling - you have the right to object to automated decision-making that produce legal effects.
- Right to judicial review - in the event that Primary Technology refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in Section 9 below.

When exercising any of these rights, please contact our Data Protection Officer using the information provided in Section 9.

4. Your Rights

You have the following rights regarding your personal data:

- Access: To obtain a copy of your data and supplementary information (subject to a reasonable and proportionate search)
- Rectification: To correct inaccurate or incomplete data
- Erasure: To request deletion of your data in certain circumstances (“right to be forgotten”)
- Restriction: To request restriction of processing in certain cases
- Portability: To receive your data in a portable format
- Objection: To object to processing, including direct marketing
- Automated decision-making: To object to and seek human intervention in automated decisions that have legal or significant effects
- Complaint: To lodge a complaint with the Information Commissioner’s Office (ICO)

To exercise your rights, contact our Data Protection Officer (see Section 9).

5. Data Collection

We collect different categories of personal data from data subjects and this varies depending on the relationship we have with them. The types of personal data collected will depend on the category of data subject you may fit into, such as employee, contractor, customer, visitor of the website or visitor to our offices.

If you are an Employee, please refer to the Employee Handbook you have been provided with in order to fully understand the data we will process.

If you are a Contractor, Customer, potential Contractor or potential Customer, we will collect the following details about you:

- Contact information including full name, along with additional contact information such as email address, phone number and job title.
- Other necessary information that is required to procure or deliver services or otherwise perform our duties, including any contractual obligations.

If you are a visitor of our website, we will process information such as IP address, web browser type, operating system and further details that you allow us to collect, based on cookies. Please refer to the website privacy policy and website cookie policy for the full details:

- Website privacy policy: <https://primaryt.co.uk/privacy-policy/>
- Website cookie policy: <https://primaryt.co.uk/cookie-policy/>

If you are a visitor of our offices, we will collect contact information including your full name, along with additional contact information such as email address, phone number, job title and vehicle registration plate. In some circumstances, we reserve the right to request more information, along with a reasonable explanation for the request.

In order to legally collect the information described above, we rely on the following legal grounds:

- Your consent
- In order to meet existing and ongoing obligations of a contract with you
- In order to enter into a contract with you
- In order to fulfil our legal obligations

- For our legitimate interests

6. Data Sharing & International Transfers

We retain personal data only as long as necessary for the purposes collected, or as required by law. Our retention practices are regularly reviewed.

7. Disclosure of data

We may share your data with trusted third parties for contractual performance, legal obligations, or legitimate interests.

A list of third-party processors is available at: <https://primaryt.co.uk/policies/data-sub-processors>

International transfers are made only where the destination provides an adequate level of protection, in line with the DUAA's "not materially lower" standard.

8. Data Security & Breach Notification

We maintain robust technical and organisational measures to protect your data, including regular audits and board-level oversight of cyber security.

In the event of a data breach, we will notify affected individuals and the ICO within 72 hours, in accordance with legal requirements and ICO guidance.

9. Complaints & Contact

If you do not feel satisfied with our Privacy Notice or if you have an enquiry about the processing of personal data, we encourage you to contact our Data Protection Officer.

In the event that you wish to make a complaint about how your personal data is being processed by Primary Technology or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority

	Supervisory authority contact details	Data Protection Officer contact details
Contact Name	Information Commissioners Office	Primary Technology Limited
Address line 1	Wycliffe House	4 Legrams Terrace
Address line 2	Water Lane	Fieldhead Business Centre
Address line 3	Wilmslow	Bradford
Address line 4	Cheshire	West Yorkshire
Postcode	SK9 5A	BD7 1LN
Email	registration@ico.org.uk	dpo@primaryt.co.uk
Telephone	0303 123 1113	01274 918 777