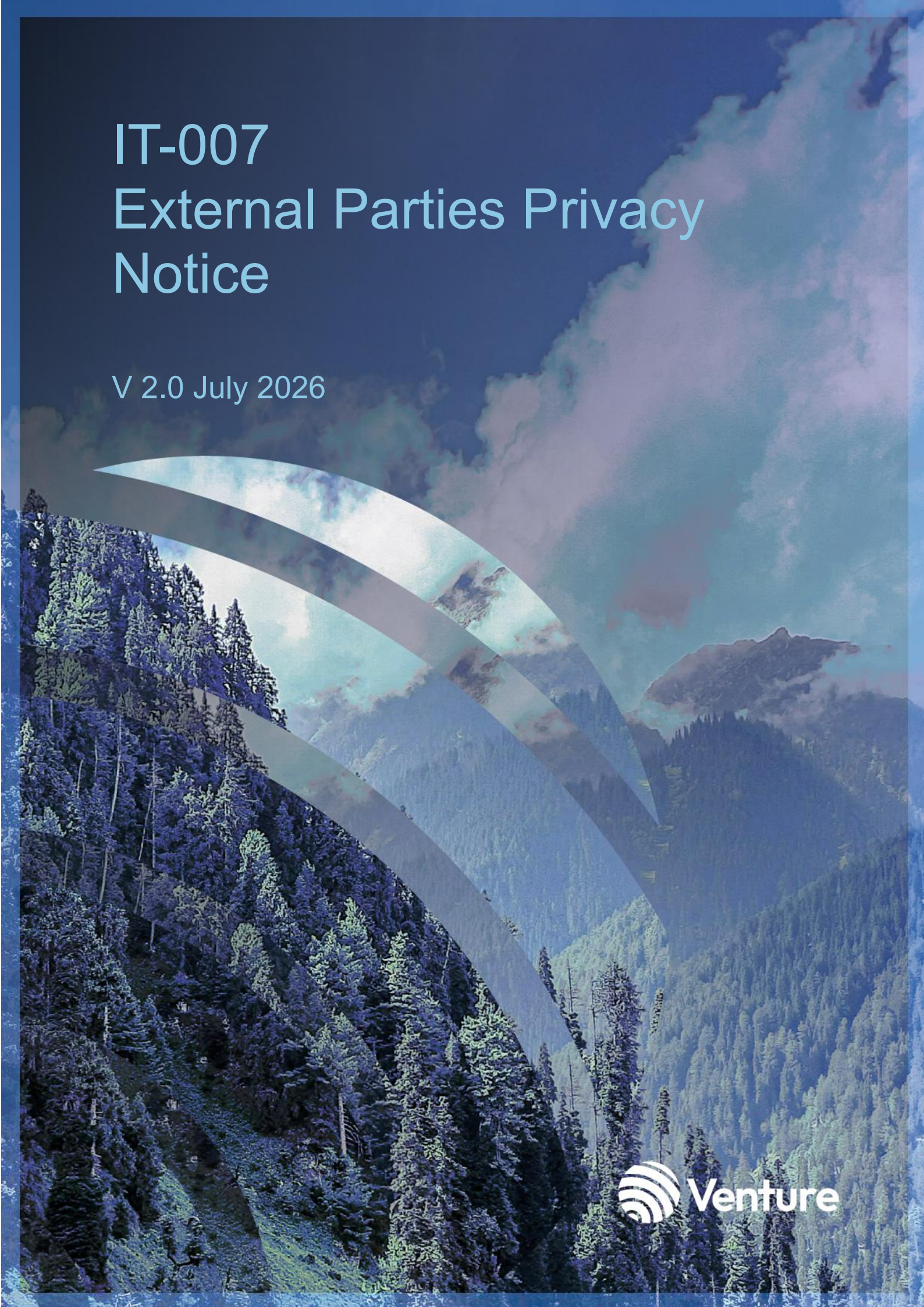
IT-007 External Parties Privacy Notice

V 2.0 July 2026



Version	Date	Author	Changes Made	Next Review
1.0	01 September 2025	HR & Ops Director	Initial policy issue	01 September 2026
2.0	07 July 2026	HR & Ops Director	Review by PAAC IT	07 July 2027

Overview

Venture Systems Group Ltd strongly believes in protecting the privacy of the personal data you provide us. We also believe it is important to inform you about how we will use your data. This document explains how we may process your personal data and the rights you have in this respect. Therefore, we encourage you to read this Privacy Notice carefully.

Your information will be collected by us. More information on Venture Systems Group Ltd can be found at https://venturesystemsgroup.com/.

Please contact Emma Crabb, HR and Operations Director for any queries regarding data protection at emma.crabb@venturesystemsgroup.com.

Your personal information will be held securely by us so that we and any of our external service providers can look after your relationship with us. This will include information you provide when you apply to us, and any additional information provided by you in various ways including the below.

What information do we collect from you?

We collect information to help manage your interactions with us and to provide a quality service:

- To deliver products and services you have ordered from us;
- To manage the services we provide to you;
- To charge you for the products and services you have ordered from us;
- To be able to answer questions you may have now and in the future about the services we have provided to you;
- To tell you about our products and services; and
- To help us run and grow our business.

We are also required to keep some information about you for legal reasons.
We will not collect any personal information from you we do not need, and we do not sell your information to third parties.

Information collected via our website

You can visit our site without telling us who you are or providing us with any personal information. However, we may collect the I.P. (Internet protocol) addresses of all our website visitors and other related information to be used to improve our website. We use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone.

Our use of cookies and analytics

We use cookies and similar technologies to collect information about the pages you access or visit. Cookies are bits of information that are automatically stored on your computer, so we can recognise you when you return. This enables us to understand your use of our website so that we can continue to improve and refine it for a better customer experience. Cookies can be disabled via your browser; however, this may affect the quality of the features on our site. The information collected through cookies may be combined with other identifiable personal information from our records and other sources. We may use this combined information for future marketing initiatives. To find our further information about cookies please visit a third-party information site, such as www.allaboutcookies.org.

We use a third party service, Google Analytics, on our website to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website

When you visit our website, you are presented with the option to “opt-in” to accept cookies. Our lawful basis for using cookies is your Consent via opting in.

Making Contact via our website

You may choose to raise a query with us via the contact forms provided on our website. In this case we will collect and store your name and email address. As an alternative method of contact you may click on one of the email addresses on our website. In this case the link will open your own email application and you will not need to save your information on our website.

Information collected for our Email Newsletter

You may choose to subscribe to our email newsletter from our website. If you subscribe to our newsletter we use a “double opt-in” method to verify you are who you say you are. In order to send you the newsletter we will collect your name and email address and your preferences. We gather statistics around email opening and clicks using industry standard technologies.
Our lawful basis for holding this personal information is that you provide your Consent through opting in. You may withdraw your consent at any time by clicking the “unsubscribe” link contained in each newsletter.

We may collect this information in a variety of ways. For example, data might be collected through application forms, CVs or resumes; obtained from your passport or other identity documents such as your driving license; from forms completed by you at the start of or during employment (such as benefit nomination forms); from correspondence with you; or through interviews, meetings or other assessments.

Information collected about our Customers where we are the Data Controller

When you purchase a service from us, we will collect the personal information required to perform the service. This information may include your name, billing and installation addresses, email address, phone number, payment method and other location information required to perform the service.

We may retain this information to assist you in the future. Many customers encourage us to keep records of their previous purchases and personal information in order for us to provide an easier

service on subsequent visits. If you do not wish us to retain your personal information, please let us know at the time of purchase.

Our lawful basis for collecting and processing customer and prospective customer information is contract including activities necessary before entering into a contract, during the delivery of our services, and following the end of our contractual relationship to fulfil our contractual and legal obligations.

Retention of Personal Information

We only keep your personal information as long as necessary for the purposes we collected it, or as otherwise required by law.

Who has access to data?

Access to your personal information is restricted to those employees, contractors and trusted service providers who require it to perform their duties and deliver our services.
This may include members of our sales and marketing team, project management team, technical support team, finance team and authorised contractors acting on behalf of Venture Systems Group. We will never sell your personal information or share it with third parties for their own marketing purposes. Your information will only be shared where it is necessary to fulfil our contractual obligations, provide our services, comply with legal or regulatory requirements, or where you have given your consent.

Personal information is primarily stored and processed using secure cloud-based business platforms, including Microsoft 365 for customer relationship management, communications, document management and service delivery, and Xero for financial and accounting records. We may also use other carefully selected cloud service providers to support the delivery of our services. All third-party providers are subject to appropriate contractual, confidentiality and security requirements to ensure your personal information remains protected.

We will not transfer your data to countries outside the European Economic Area unless agreed with a client.

How long will we hold your data?

We will hold your personal data for the duration of your engagement with Venture. The periods for which your data is held after the end of employment are detailed below:

Data Type	How long it is stored	The reason why it is retained
Contact details (name, job title, company, business email address and telephone number)	Duration of the business relationship plus 7 years	To manage customer and supplier relationships, fulfil contracts and maintain business records.
Customer account and contract information	7 years after the end of the contractual relationship	To fulfil contractual obligations, maintain service records and comply with legal and accounting requirements.

Support requests, service tickets and project records	7 years after completion of the service or contract	To provide ongoing support, maintain service history, resolve disputes and demonstrate contractual performance.
Communications (emails, meeting notes and correspondence)	7 years	To maintain an accurate record of business communications and contractual discussions.
Financial and billing information	7 years	To comply with HMRC requirements and financial record-keeping obligations.
Marketing preferences	Until consent is withdrawn or 24 months after the last meaningful interaction	To manage marketing communications and comply with privacy legislation.
Website enquiries and contact form submissions	24 months	To respond to enquiries and support potential business opportunities.
Website usage information (cookies, IP address and analytics data)	In accordance with our Cookie Policy, typically up to 26 months	To improve website performance, maintain security and understand website usage.

How will we secure your data?

We take the security of your data seriously. We have internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused, or disclosed, and is not accessed except by its employees in the performance of their duties.

Where we engage third parties to process personal data on our behalf, we do so based on written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

Your rights:

As a data subject, you have several rights. You can:

- Access and obtain a copy of your data on request. This is commonly known as a “data subject access request” and enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Require the organisation to change incorrect or incomplete data.
- Require the organisation to delete or remove your data where there is no good reason for the organisation to continue processing it. You also have the right to ask the organisation to delete or remove your personal information where you have exercised your right to object (see below).
- Object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing and there is something about your situation which makes you want to object to processing on this ground. Legitimate Interest means the interest of Venture’s business in conducting and managing its business to enable it to give the best service/product; and
- Request the transfer of your data to another party.

You also have the right to be informed about how your data will be collected, processed, and stored. We are meeting this obligation by publishing this privacy notice but, if you do not feel that the notice is clear or comprehensive enough you are welcome to contact us, and we will do our best to explain how your data is handled by us.

If you would like to exercise any of these rights or if you have any questions about how your data is handled, please contact **Emma Crabb** at emma.crabb@venturesystemsgroup.com**.**

If you believe that we have not complied with your data protection rights, you can discuss this with Venture’s Data Protections Contact (see contact details above) or complain to the Information Commissioners Office which enforces data protection laws: https://ico.org.uk

Modifications:

This Privacy Notice may be adjusted from time to time. We reserve the right to modify or amend this Privacy Notice at any time. The effective date of this Privacy Notice is displayed at the beginning of this notice. Please check back periodically, and especially before you provide any personally identifiable information.