

## UK DATA PROTECTION NOTICE

# Privacy Policy

*How we collect, use, share and protect personal data*

|                                                                                          |                                               |
|------------------------------------------------------------------------------------------|-----------------------------------------------|
| ORGANISATION<br><b>Integral Digital Technologies Ltd trading as Free Website Wizards</b> | COMPANY<br><b>13682575</b>                    |
| EFFECTIVE DATE<br><b>20 August 2026</b>                                                  | CONTACT<br><b>info@freewebsitewizards.com</b> |

Registered office: Office 6, St. Pauls Road, Newton Abbot, Devon, England, TQ12 2HP

This Policy applies when Free Website Wizards acts as controller. For personal data processed within a client's hosted website, the client will usually be the controller and its own privacy notice will apply.

## 1. WHO WE ARE

- 1.1 Integral Digital Technologies Ltd is a company registered in England and Wales under company number 13682575. Our registered office is Office 6, St. Pauls Road, Newton Abbot, Devon, England, TQ12 2HP.
- 1.2 We trade as **Free Website Wizards**. For the activities described in this Policy, we are normally the controller of your personal data. This means that we decide why and how that data is used.
- 1.3 You can contact us about privacy or exercise your rights by emailing **info@freewebsitewizards.com** or writing to our registered office.
- 1.4 When we host or support a website for a client, the client will usually be the controller of personal data collected through that website and we will act as its processor. In that situation, the client's own privacy notice applies to the affected individuals. Requests about data collected through a client's website should normally be sent to that client first.

## 2. WHO THIS POLICY COVERS

- 2.1 This Policy covers:
  - 39.1 visitors to our website;
  - 39.2 people who enquire about, apply for or purchase our services;
  - 39.3 owners, directors, employees, contractors and other contacts of current or prospective clients;

- 39.4 suppliers, professional advisers and business contacts; and
- 39.5 people who contact our support or complaints teams.
- 2.2 Our services are intended for organisations and people acting for business or organisational purposes. Our website and services are not directed at children, and we do not knowingly collect personal data from children through our own signup process.

### 3. PERSONAL DATA WE COLLECT

- 3.1 Depending on how you interact with us, we may collect:
  - 39.6 **identity and contact data**, such as your name, job title, organisation, postal address, telephone number and email address;
  - 39.7 **business and project data**, such as information about your organisation, existing website, goals, chosen services, website requirements, content and technical environment;
  - 39.8 **account and security data**, such as usernames, authentication records, access permissions, password-reset records and security logs. We do not store passwords in readable form;
  - 39.9 **contract and transaction data**, such as Order Forms, service plans, invoices, payment status, licence allocations and correspondence about the Agreement;
  - 39.10 **payment data**, such as billing contact details, payment method, transaction references and limited payment information supplied by our payment provider. We do not ordinarily receive or store complete payment-card details;
  - 39.11 **communications and support data**, including emails, telephone notes, tickets, feedback, complaint records and information supplied when we diagnose an issue;
  - 39.12 **website and device data**, such as IP address, browser, device type, operating system, referring page, pages viewed, approximate location, timestamps and security or diagnostic information;
  - 39.13 **marketing data**, including your preferences, interactions with our communications and records of consent or objections; and
  - 39.14 **content and other data** that you choose to provide to us.
- 3.2 Please do not send us special-category data, criminal-offence data or highly confidential personal information unless it is necessary for an agreed service and we have confirmed appropriate arrangements in advance.

## 4. HOW WE COLLECT PERSONAL DATA

### 4.1 We collect personal data:

39.15 directly from you, including through forms, applications, contracts, email, telephone and support requests;

39.16 automatically from your browser or device through server logs, cookies and similar technologies;

39.17 from your organisation, colleagues or authorised representatives;

39.18 from referral partners, service providers and payment providers;

39.19 from publicly available sources, such as company websites, Companies House and professional directories; and

39.20 when another person legitimately introduces you or includes you in a business communication.

## 5. HOW AND WHY WE USE PERSONAL DATA

| Purpose                                                                         | Typical data                                                      | Lawful basis                                                                                                                                        |
|---------------------------------------------------------------------------------|-------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|
| Respond to enquiries, assess applications and prepare proposals or Order Forms  | Identity, contact, business, project and communications data      | Steps requested before entering a contract; legitimate interests in developing our business and responding to organisations                         |
| Set up accounts and provide website design, hosting, maintenance and support    | Identity, contact, account, project, contract and support data    | Performance of a contract; legitimate interests in administering services and client relationships                                                  |
| Take payments, allocate licences, issue invoices and maintain financial records | Identity, contact, contract, transaction and limited payment data | Performance of a contract; legal obligations; legitimate interests in collecting sums due and preventing fraud                                      |
| Communicate about projects, service notices, renewals, security and support     | Identity, contact, account, contract and communications data      | Performance of a contract; legitimate interests in operating and improving our services                                                             |
| Host, secure, monitor, troubleshoot and improve our website and infrastructure  | Website, device, security, account and support data               | Legitimate interests in providing a secure, reliable service; legal obligations where applicable; consent for non-essential cookies or technologies |
| Prevent fraud, misuse, attacks and unauthorised access                          | Identity, account, website, device, transaction and security data | Legitimate interests in protecting clients, users, systems and our business; legal obligations                                                      |
| Send relevant business marketing and measure its effectiveness                  | Identity, contact, business, marketing and interaction data       | Consent where required; otherwise legitimate interests where electronic-marketing law permits                                                       |
| Manage suppliers, advisers, disputes, complaints and legal claims               | Identity, contact, contract, transaction and communications data  | Contract; legal obligations; legitimate interests in obtaining advice and establishing, exercising or defending legal rights                        |

| Purpose                                                                | Typical data      | Lawful basis                                                                            |
|------------------------------------------------------------------------|-------------------|-----------------------------------------------------------------------------------------|
| Comply with law, court orders, tax requirements and regulator requests | Any relevant data | Legal obligations; substantial public interest or legitimate interests where applicable |

- 5.1 Where we rely on legitimate interests, we consider whether the use is necessary and balance our interests against the rights and expectations of the affected person.
- 5.2 Where we rely on consent, you may withdraw it at any time. Withdrawal does not affect processing that was lawful before consent was withdrawn.
- 5.3 We do not use personal data to make decisions based solely on automated processing that produce legal or similarly significant effects about you.

## 6. MARKETING COMMUNICATIONS

- 6.1 We may send relevant service and business communications to existing clients and business contacts where permitted by law. We will obtain consent where it is required.
- 6.2 You can stop marketing at any time by using the unsubscribe facility in the message or emailing **info@freewebsitewizards.com**. Service, security, billing and contractual notices are not marketing and may still be sent where necessary.
- 6.3 We may retain a minimal suppression record so that we can respect an opt-out.

## 7. COOKIES AND SIMILAR TECHNOLOGIES

- 7.1 Our website uses cookies, server logs and similar technologies. Strictly necessary technologies may operate without consent where permitted by law. We will ask for consent before using non-essential analytics, preference, advertising or similar technologies where consent is required.
- 7.2 More information, including how to change your choices, is provided in our Cookie Policy and the website's Cookie Settings control.

## 8. WHO WE SHARE PERSONAL DATA WITH

- 8.1 We may share personal data where necessary with:
  - 39.21 hosting, data-centre, backup, content-delivery, monitoring and cybersecurity providers;
  - 39.22 domain, email, software, licence, website-platform and technical suppliers;
  - 39.23 payment processors, banks, accountants and bookkeeping providers;

- 39.24 customer relationship, support-desk, communications and project-management providers;
  - 39.25 analytics and marketing providers, but only in accordance with your cookie and marketing choices where consent is required;
  - 39.26 professional advisers, insurers, auditors and debt-recovery providers;
  - 39.27 courts, law-enforcement bodies, regulators, tax authorities and other public bodies where disclosure is required or permitted by law;
  - 39.28 a prospective buyer, investor or successor in connection with a genuine business transaction, subject to appropriate confidentiality; and
  - 39.29 other parties where you ask us to share information or give valid consent.
- 8.2 Our suppliers may use personal data only for the agreed purpose and must protect it under appropriate contractual and security obligations.
- 8.3 We do not sell personal data.

## 9. INTERNATIONAL TRANSFERS

- 9.1 Our principal production hosting is intended to remain in the United Kingdom. Some software, communications, security, analytics or support suppliers may process limited personal data outside the UK.
- 9.2 Where a restricted transfer occurs, we will use a lawful transfer mechanism, such as UK adequacy regulations, the UK International Data Transfer Agreement, the UK Addendum to approved standard contractual clauses or another legally permitted safeguard. We will apply supplementary measures where appropriate.
- 9.3 You may contact us for more information about the safeguards relevant to your personal data.

## 10. HOW LONG WE KEEP PERSONAL DATA

- 10.1 We keep personal data only for as long as reasonably necessary for the purpose collected, including legal, accounting, security and dispute requirements. Our usual periods are:

| Record                                                               | Usual retention period                                    |
|----------------------------------------------------------------------|-----------------------------------------------------------|
| Unsuccessful or inactive enquiries and applications                  | Up to 24 months after the last meaningful contact         |
| Client contracts, Order Forms, invoices and core transaction records | Normally 7 years after the end of the client relationship |
| Project files, approvals and material service correspondence         | Normally 6 years after project completion or termination  |

| Record                               | Usual retention period                                                                                                            |
|--------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|
| Support tickets and operational logs | According to operational need and risk, normally no longer than 24 months unless required for a dispute or security investigation |
| Security, access and diagnostic logs | Normally between 30 days and 12 months, depending on the system and risk                                                          |
| Marketing records                    | Until you opt out or the data is no longer useful, with a minimal suppression record retained as necessary                        |
| Cookie and consent records           | For the duration stated in the Cookie Settings register and as reasonably necessary to demonstrate choices                        |

10.2 We may keep information longer where required by law, where a dispute is anticipated or active, or where necessary to establish, exercise or defend legal rights. We may retain anonymous information indefinitely because it no longer identifies anyone.

## 11. SECURITY

- 11.1 We use technical and organisational measures designed to protect personal data against unauthorised access, loss, alteration or disclosure. These may include access controls, authentication, encryption in transit, backups, monitoring, patching, supplier controls and incident-management procedures.
- 11.2 No internet or storage system can be guaranteed completely secure. You are responsible for keeping account credentials confidential and for contacting us promptly if you suspect unauthorised access.

## 12. YOUR DATA-PROTECTION RIGHTS

- 12.1 Depending on the circumstances, you may have rights to:
- 39.30 be informed about how your personal data is used;
  - 39.31 obtain access to your personal data and a copy of it;
  - 39.32 have inaccurate or incomplete data corrected;
  - 39.33 ask for personal data to be erased;
  - 39.34 ask us to restrict how personal data is used;
  - 39.35 receive certain data in a portable format;
  - 39.36 object to processing based on legitimate interests or to direct marketing;
  - 39.37 withdraw consent at any time; and

39.38 complain to a supervisory authority.

12.2 These rights are not absolute and exemptions may apply. We may ask for information reasonably necessary to confirm your identity and locate the relevant records. We normally respond within one month, subject to any lawful extension.

12.3 To exercise a right, email **info@freewebsitewizards.com**. You do not normally have to pay a fee, although the law permits a reasonable fee or refusal in limited cases involving manifestly unfounded or excessive requests.

## 13. COMPLAINTS

13.1 Please contact us first at **info@freewebsitewizards.com** so that we can investigate and try to resolve your concern.

13.2 You may also complain to the Information Commissioner's Office. Details are available at <https://ico.org.uk/make-a-complaint/> or by telephoning 0303 123 1113. If you live outside the UK, you may also have a right to contact your local data-protection authority.

## 14. THIRD-PARTY WEBSITES

14.1 Our website may link to websites, platforms or services controlled by other organisations. Their privacy practices are governed by their own notices. We are not responsible for how an independent third party uses personal data.

## 15. CHANGES TO THIS POLICY

15.1 We may update this Policy to reflect changes in law, technology or our services. The current version will be published on our website with its effective date.

15.2 If a change materially affects how we use personal data, we will take reasonable steps to bring it to the attention of affected people before the new use begins where required.

## 16. CONTACT

16.1 Privacy enquiries and rights requests should be sent to:

**Email:** [info@freewebsitewizards.com](mailto:info@freewebsitewizards.com)

**Post:** Integral Digital Technologies Ltd trading as Free Website Wizards, Office 6, St. Pauls Road, Newton Abbot, Devon, England, TQ12 2HP