

# Privacy Policy

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| <b>Document Owner</b>   | Chief Operating Officer                          |
| <b>Approved By</b>      | Chief Operating Officer                          |
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## 1. Introduction

Pensar Systems Ltd ("Pensar IT", "we", "us", or "our") is committed to protecting the privacy and security of personal data.

This Privacy Policy explains how we collect, use, store, and protect personal data in accordance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Applicable data protection and privacy legislation

This policy applies to personal data processed in the course of our business operations and delivery of managed IT services.

## 2. Who We Are

Pensar Systems Ltd provides managed IT services, cloud services, and technology consultancy to business clients.

For the purposes of data protection law, we may act as:

- A **Data Controller** (e.g., for employee or marketing data), or
- A **Data Processor** (e.g., when processing client data as part of MSP services).

Where we act as a processor, we process personal data only in accordance with our client's documented instructions.

### 3. Personal Data We Collect

We may collect and process the following categories of personal data:

#### 3.1 Client and Business Contact Data

- Name
- Job title
- Company name
- Business email address
- Business phone number

#### 3.2 Service Delivery Data

In the provision of managed IT services, we may process:

- User account identifiers
- Authentication logs
- Device identifiers
- Email metadata
- System activity logs

Where access to client systems is required, processing is limited to what is necessary to provide contracted services.

#### 3.3 Employee and Contractor Data

- Contact information
- Payroll and tax information
- Emergency contact details
- Training and compliance records

#### 3.4 Website and Technical Data

When visiting our website, we may collect:

- IP address
- Browser type
- Device type
- Cookies and usage data

## 4. Lawful Basis for Processing

We process personal data under one or more of the following lawful bases:

- **Contractual necessity** – to deliver services
- **Legal obligation** – to comply with regulatory requirements
- **Legitimate interests** – for business operations, security, and service improvement
- **Consent** – where required (e.g., marketing communications)

Where special category data is processed, an additional lawful condition under Article 9 UK GDPR applies.

## 5. How We Use Personal Data

We use personal data to:

- Deliver managed IT services
- Provide technical support
- Manage contracts and billing
- Maintain system security and monitoring
- Comply with legal obligations
- Communicate with clients and partners
- Manage recruitment and employment processes

We do not sell personal data.

## 6. Data Retention

Personal data is retained only for as long as necessary to fulfil its intended purpose.

Retention periods are determined by:

- Contractual requirements
- Legal obligations
- Regulatory requirements
- Business necessity

When no longer required, personal data is securely deleted or anonymised in accordance with our Data Retention and Media Sanitisation policies.

## 7. Data Security

We implement appropriate technical and organisational measures to protect personal data, including:

- Multi-Factor Authentication (MFA)
- Role-based access controls
- Endpoint protection and monitoring
- Encryption in transit and at rest
- Security logging and monitoring
- Patch management and vulnerability management

Access to personal data is restricted to authorised personnel only.

## 8. Data Sharing

We may share personal data with:

- Technology vendors (e.g., Microsoft)
- Cloud hosting providers
- Professional advisers (legal, accounting)
- Regulatory authorities where required by law

All third-party processors are subject to contractual data protection obligations.

## 9. International Data Transfer

Where personal data is transferred outside the UK, we ensure appropriate safeguards are in place, including:

- UK International Data Transfer Agreements (IDTAs)
- Standard Contractual Clauses (SCCs)
- Transfers to countries with UK adequacy decisions

Cloud service providers such as Microsoft operate under approved transfer mechanisms

## 10. Data Subject Rights

Individuals have the following rights under UK GDPR:

- Right of access
- Right to rectification
- Right to erasure
- Right to restriction
- Right to data portability
- Right to object
- Rights relating to automated decision-making

Requests may be submitted via the contact details below.

We will respond within one calendar month.

## 11. Data Breaches

In the event of a personal data breach:

- We will assess risk immediately
- Notify the ICO within 72 hours where required
- Inform affected individuals where legally required

All incidents are managed under our Incident Response procedures.

## 12. Contact Details

For questions about this Privacy Policy or to exercise your data protection rights, please contact:

Data Protection Officer  
Pensar Systems Ltd  
128 City Road  
London

EC1V 2NX  
United Kingdom

Email: [hello@pensar.co.uk](mailto:hello@pensar.co.uk)

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO):

<https://www.ico.org.uk>

### 13. Changes to This Policy

We may update this Privacy Policy periodically to reflect changes in legislation or business operations.

The latest version will always be available upon request or on our website.

### 15. Revision History

| Version | Date       | Change Summary                             | Updated By (Role)       |
|---------|------------|--|-------------------------|
| v1.0    | 18/03/2025 | Initial draft                              | Chief Operating Officer |
| v1.1    | 12/02/2026 | Structured as public-facing Privacy Policy | Chief Operating Officer |