

1. INTRODUCTION:

1.1 Pinage Holdings Ltd ("we", "us", "our", "PHL") is committed to protecting your privacy and personal data. This Privacy Policy explains how we collect, use, store and protect personal information in connection with our digital signage services.

1.2 This policy applies to:

- business clients who subscribe to our services;
- individuals who access our digital signage platform;
- visitors to our website; and
- anyone who contacts us for support or information.

1.3 We are the data controller for the personal data described in this policy. This means we determine how and why that personal data is processed. Where a client uploads personal data to our platform as part of its displayed content, the client is the data controller for that content and we act as data processor in accordance with our Data Processing Addendum (Schedule 5 to the Master Services Agreement).

1.4 Pinage Holdings Ltd is registered in England and Wales under company number 16534416 and with the Information Commissioner's Office under registration number ZC087012.

2. INFORMATION WE COLLECT:

2.1 Account information

When you register for our services we collect your full name, email address, company name and business address, telephone number, and job title or role.

2.2 Login and technical information

When you use our platform we automatically collect your username, a hashed version of your password, your IP address, device type and operating system, browser type and version, login times and session duration, and the pages and features you access.

2.3 Billing and payment information

For subscriptions and payments we collect your billing address, purchase order numbers, invoice history, and bank details for direct debit or bank transfer payments.

2.4 Support and communication data

When you contact us for support we collect email correspondence, support request details, and any information you provide in your communications.

2.5 Website analytics

When you visit our website we may collect information through cookies and similar technologies, including the pages you visit and time spent, referral sources, and approximate geographic location (such as city, region or country). Non-essential cookies are only used with your consent — see Section 11.

2.6 Content you upload

We do not access or view the content you display via our digital signage platform in the ordinary course of business. We do host, store, transmit and back up that content in order to deliver the services, and where it contains personal data we do so as your data processor under the Data Processing Addendum. We may access content when providing content management services, when providing technical support at your request, when investigating a suspected breach of our terms, or where required by law. You remain the data controller for any personal data contained in your displayed content.

2.7 Personal data we receive from our clients

Where you are an employee, officer or contractor of one of our clients, we usually receive your business contact details — your name, job title, work email address and work telephone number — from that client rather than from you directly, so that we can create your account and provide the services. We process that information as controller for the purposes described in Section 3. Our clients are required to inform their personnel that these details will be provided to us.

2.8 Automated decision-making

We do not carry out automated decision-making or profiling that produces legal effects concerning you or similarly significantly affects you.

2.9 Whether you have to provide information

Providing account and billing information is necessary for us to enter into and perform our contract with your organisation. Without it we cannot create or maintain an account or provide the services.

3. HOW WE USE YOUR INFORMATION:

3.1 To provide our services

Creating and managing your account; delivering our digital signage platform; processing subscription payments; providing customer support; and sending service-related notifications.

Legal basis: performance of a contract, or our legitimate interests in administering a contract with the organisation you work for.

3.2 To improve our services

Analysing usage patterns to improve functionality; identifying and fixing technical issues; developing new features; and understanding customer needs.

Legal basis: legitimate interests (improving and securing our services).

3.3 For business operations

Maintaining business records; accounting and tax compliance; managing customer relationships; and enforcing our terms.

Legal basis: legal obligation, and legitimate interests (running our business and enforcing our rights).

3.4 For marketing

Sending information about our services, new features and relevant industry news to business contacts.

Legal basis: legitimate interests (promoting our services to business contacts).

We send electronic marketing in accordance with the Privacy and Electronic Communications Regulations 2003. You may object or opt out at any time, using the unsubscribe link in any message or by contacting us. Where consent is required, we will obtain it before sending.

3.5 For legal compliance and security

Responding to legal requests and court orders; preventing fraud and misuse of our services; and protecting our rights, property and safety.

Legal basis: legal obligation, and legitimate interests (protecting our business and our users).

3.6 Legitimate interests assessments

Where we rely on legitimate interests we have carried out an assessment balancing those interests against your rights. You can request a summary of the relevant assessment by contacting us at dpo@pinage.co.uk.

4. HOW WE SHARE YOUR INFORMATION:

We do not sell, rent or trade your personal data. We share it only in the limited circumstances below.

4.1 Service providers and sub-processors

We use carefully selected third-party providers to help deliver our services. Our current sub-processors are:

- Sherr Technologies Ltd — platform infrastructure, hosting and email services. Processing takes place in the United Kingdom.
- Google LLC (Google Analytics) — website analytics. Where you consent to analytics cookies, analytics data is processed by Google in the United States under the UK-US Data Bridge (see Section 5). Google is certified under that framework.

Sherr Technologies Ltd is a company connected to our directors. It is engaged on arm's-length terms and is subject to the same contractual data protection obligations as any other supplier.

We do not currently use a third-party payment processor; subscription payments are taken by bank transfer or direct debit. We do not currently use a third-party support ticketing system. We will update this policy if either changes.

All of our service providers are required by contract to process personal data only on our instructions, to implement appropriate security measures, and to comply with the UK GDPR. We remain responsible for their acts and omissions.

We notify clients of any proposed change to our sub-processors and provide a reasonable opportunity to object.

4.2 Business transfers

If we are acquired, merge with another company, or sell our business, personal data may be transferred to the new owner. We will notify you of any such transfer.

4.3 Legal requirements

We may disclose personal data where required by law, court order or a regulatory authority, or where necessary to protect our rights, property or safety, or those of others.

4.4 With your consent

We may share information with third parties where you have given us your explicit consent.

5. INTERNATIONAL DATA TRANSFERS:

5.1 Your personal data is stored and processed within the United Kingdom. The main exception is website analytics data, which is processed by Google as described in Section 5.2.

5.2 We do not transfer personal data outside the United Kingdom unless you explicitly request it, or a sub-processor operates outside the United Kingdom. Where a transfer takes place we ensure an appropriate safeguard is in place, such as an adequacy decision, the UK International Data Transfer Agreement, or the UK Addendum to the EU Standard Contractual Clauses, and we carry out the data protection test required by law. For example, where you consent to analytics cookies, Google Analytics processes analytics data on our behalf in the United States, relying on the UK-US Data Bridge (the UK extension to the EU-US Data Privacy Framework), under which Google is certified.

5.3 We will update this policy before any change to the position in Section 5.1 takes effect.

6. HOW LONG WE KEEP YOUR DATA:

We keep personal data only for as long as necessary for the purposes described in this policy:

Data type	Retention period	Reason
Account information	Duration of the contract, plus 7 years	Legal, tax and limitation period requirements
Billing and payment data	7 years from the last transaction	Tax and accounting requirements
Support communications	3 years	Customer service and dispute resolution
Technical and security logs	12 months from collection	Security monitoring and troubleshooting
Marketing data	Until you opt out, or 3 years of inactivity	Managing marketing preferences

Data type	Retention period	Reason
Complaints records	6 years from resolution	Demonstrating compliance and handling any subsequent claim
Client Content and Client Personal Data	As set out in the Data Processing Addendum	We act as processor for this data

After the retention period expires we securely delete or anonymise the personal data. Data held in routine backups is deleted in accordance with our ordinary backup cycle.

7. YOUR RIGHTS:

Under the UK GDPR you have the following rights.

Access — you can request a copy of the personal data we hold about you.

Rectification — you can ask us to correct inaccurate or incomplete data.

Erasure — you can ask us to delete your personal data in certain circumstances.

Restriction — you can ask us to limit how we use your data in certain situations.

Portability — you can ask for your data in a structured, commonly used, machine-readable format, and to have it transferred to another provider.

Objection — you can object to processing based on legitimate interests, and to direct marketing at any time.

Withdrawal of consent — where we rely on consent, you can withdraw it at any time. This does not affect processing carried out before withdrawal.

How to exercise your rights

Contact our Data Protection Contact at dpo@pinage.co.uk, or by post at: Data Protection Contact, Pinage Holdings Ltd, Kinetic Centre, Theobald Street, Borehamwood, Hertfordshire, WD6 4PJ.

We will respond within one month of receiving your request, or sooner where possible. Where a request is complex or where you have made several requests, we may extend this by up to two further months and will tell you if we do.

Pinage Holdings Ltd has not appointed a formal Data Protection Officer under Article 37 of the UK GDPR. The dpo@pinage.co.uk address is a contact alias for data protection enquiries and is monitored.

8. COMPLAINING TO US:

8.1 If you are unhappy with how we have handled your personal data you can complain to us directly. You do not need to complain to us before going to the Information Commissioner's Office, but it will usually be quicker if you do.

8.2 You can complain in any way that suits you — by email to dpo@pinage.co.uk, by post to the address in Section 7, or through any other channel by which you normally contact us.

8.3 We will acknowledge your complaint within 30 days of receiving it, and will begin looking into it without undue delay. We will carry out an investigation that is reasonable and proportionate to the issues raised and the impact on you, and we will tell you the outcome.

8.4 Complaining to us does not affect your right to complain to the Information Commissioner's Office:

- Website: <https://ico.org.uk>
- Helpline: 0303 123 1113

9. SECURITY:

9.1 Technical measures

Encryption of data in transit using TLS 1.2 or higher; encryption of personal data at rest; secure password storage using industry-standard hashing with salt; regular security updates and patching; firewall and intrusion detection; and access controls and authentication.

9.2 Organisational measures

Access to personal data limited on a need-to-know basis; staff training on data protection and information security; confidentiality obligations for employees and contractors; documented incident response procedures; and regular security review.

9.3 Your responsibilities

You are responsible for keeping your login credentials secure, using a strong password, not sharing your account, enabling multi-factor authentication where it is available, and notifying us promptly if you suspect unauthorised access.

9.4 The technical and organisational measures applying to personal data we process on behalf of clients are set out in Annex 2 to Schedule 5 (Data Processing Addendum).

10. DATA BREACHES:

10.1 Where a personal data breach is likely to result in a risk to your rights and freedoms, we will report it to the Information Commissioner's Office without undue delay and, where feasible, within 72 hours of becoming aware of it.

10.2 Where a personal data breach is likely to result in a high risk to your rights and freedoms, we will also notify you without undue delay, and will tell you what has happened, what the likely consequences are, and what we are doing about it.

10.3 Where we act as processor for a client, our breach notification obligations to that client are set out in Schedule 5 (Data Processing Addendum).

11. COOKIES:

11.1 Our website and platform use cookies and similar technologies. Full details of the cookies we use, and how to accept or reject non-essential cookies, are set out in our Cookie Policy at www.pinage.co.uk/cookiepolicy.

11.2 Essential cookies are necessary for the platform to function and do not require your consent. Analytics and marketing cookies are only set with your consent, which you can give or withdraw at any time through our cookie preference tool.

12. CHILDREN:

Our services are intended for business use only. We do not knowingly collect personal data from anyone under 18. If you believe we have inadvertently done so, please contact us and we will delete it.

13. THIRD-PARTY LINKS:

Our website and platform may contain links to third-party websites or services. We are not responsible for their privacy practices. Please review their privacy notices before providing them with personal information.

14. CHANGES TO THIS POLICY:

14.1 We may update this policy from time to time to reflect changes in our practices or in the law.

14.2 When we make a significant change we will update the version number and "Last Updated" date at the bottom of this policy and notify you by email or through the platform. Where the law requires your consent to a change, we will obtain it.

14.3 We keep dated copies of previous versions of this policy and will provide one on request.

14.4 We review this policy at least annually.

15. CONTACT US:

Data protection enquiries, rights requests and complaints

Email: dpo@pinage.co.uk

Post: Data Protection Contact, Pinage Holdings Ltd, Kinetic Centre, Theobald Street, Borehamwood, Hertfordshire, WD6 4PJ

General enquiries

Email: support@pinage.co.uk

Website: www.pinage.co.uk

Legal information

Data controller: Pinage Holdings Ltd, company number 16534416, registered in England and Wales.

Regulator: Information Commissioner's Office, registration number ZC087012.

This policy is governed by the law of England and Wales.