Angelic Software Ltd. customer privacy notice

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- Sharing information outside the UK
- How to complain

Contact details

Email

aidan.fell@angelic-software.com

What information we collect, use, and why

We collect or use the following information to **provide and improve products** and services for clients:

- Names and contact details
- Occupation
- Third party information (such as family members or other relevant parties)
- Usage data (including information about how you interact with and use our website, products and services)

• Account access information

We collect or use the following personal information for the **operation of client or customer accounts**:

- Names and contact details
- Purchase or service history

We collect or use the following personal information for **information updates or marketing purposes**:

- · Names and contact details
- Purchase or account history

We collect or use the following personal information for **dealing with queries**, **complaints or claims**:

- Names and contact details
- Payment details
- Customer or client accounts and records

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible <u>lawful</u> <u>bases</u> in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

• Your right of access - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions

which means you may not receive all the information you ask for. Read more about the right of access.

- Your right to rectification You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. Read more about the right to rectification.
- Your right to erasure You have the right to ask us to delete your personal information. Read more about the right to erasure.
- Your right to restriction of processing You have the right to ask us to limit how we can use your personal information. Read more about the right to restriction of processing.
- Your right to object to processing You have the right to object to the processing of your personal data. Read more about the right to object to processing.
- Your right to data portability You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. Read more about the right to data portability.
- Your right to withdraw consent When we use consent as our lawful basis you have the right to withdraw your consent at any time. Read more about the right to withdraw consent.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide and improve products and services for clients** are:

• Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Our lawful bases for collecting or using personal information for the **operation of client or customer accounts** are:

- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation we have to collect or use your information so we can
 comply with the law. All of your data protection rights may apply,
 except the right to erasure, the right to object and the right to data
 portability.

Our lawful bases for collecting or using personal information for **information updates or marketing purposes** are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - o We may also process information under our legitimate interest to keep clients informed about improvements or new features, where such updates are relevant and expected.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

• Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - o We may wish to identify patterns to improve processes. Data will be minimised or anonymised.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Where we get personal information from

- Directly from you
- Suppliers and service providers
- Third parties:
 - o Information contained in documents, records, or systems provided by our clients that may include personal information of their employees, customers, or other individuals. We process this data only as necessary to maintain, troubleshoot, or improve the services we provide under our contract.

How long we keep information

The retention of personal information depends on the system and purpose for which it is collected.

- **Power Automate flow history:** Flow run logs, including information on who triggered the flow and the steps performed, are retained by default for **up to 30 days**.
- Operational or derived logs: Any logs or records we maintain outside of Power Automate (for example, in SharePoint lists) are retained only as long as necessary to provide and improve our services, or as required to meet contractual or legal obligations.

 Other client system data: Personal information contained within documents, approvals, or other client systems is retained in accordance with the client's policies or applicable legal requirements, and only for the duration necessary to perform our contracted services.

We regularly review and delete or anonymise personal information that is no longer needed, in line with our data minimisation and security practices.

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

Who we share information with

Data processors

Microsoft Corporation

This data processor does the following activities for us: For example, Microsoft hosts and operates Power Automate, SharePoint, and Azure, storing and processing personal information on our behalf. They process data only according to our instructions, provide security measures such as encryption and access controls, and help us comply with data protection obligations. Microsoft processes personal information on our behalf under their standard Data Processing Addendum (DPA), which is included with a Microsoft 365 subscription. This ensures that data is handled in accordance with UK GDPR requirements.

Sharing information outside the UK

Where necessary, our data processors will share personal information outside of the UK. When doing so, they comply with the UK GDPR, making sure appropriate safeguards are in place.

For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us using the contact information provided above.

Organisation name: Microsoft Corporation

Category of recipient: IT services

Country the personal information is sent to: United States

How the transfer complies with UK data protection law: The country or sector has been assessed as providing adequate protection to data subjects (also known as Adequacy Regulations or UK data bridge)

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint

Last updated

27 August 2025