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PRIVACY NOTICE

BACKGROUND

Start Technology (Software) Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all our customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About Us

Start Technology (Software) Ltd.

Limited company registered in England under company number 05940522.

Registered address: e-Innovation Centre, Priorslee, Telford TF2 9FT

Main trading address: e-Innovation Centre, Telford TF2 9FT

VAT number: GB897176267

Web address: www.start-software.com

Data Protection Officer: Catherine Connery

Email address: catherine.connery@start-software.com

Telephone number: 0333 301 1010

Postal Address: e-Innovation Centre, Telford TF2 9FT

2. What Does This Notice Cover?

This Privacy Notice explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the Data Protection Act 2018 (DPA 2018) and the UK-GDPR United Kingdom General Data Protection Regulation (UK-GDPR) as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'. Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers. The personal data that we use is set out in Part 5, below.

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4. What Are My Rights?

Under the DPA and UK-GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. What Personal Data Do You Collect?

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name
- Address
- Email address
- Telephone number
- Business name
- Job title
- Profession
- Payment information.

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6. How Do You Use My Personal Data?

Under the DPA and UK-GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Providing and managing your account.
- Supplying our products and/or services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products and/or services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email and/or post that you have opted-in to (you may unsubscribe or opt-out at any time by contacting us).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message and/or post with information, news, and offers on our products and/or services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the DPA and UK-GDPR and you will always have the opportunity to opt-out.

We may also process limited personal data to deliver optional AI-assisted features, such as generating summaries, or drafting notes. These features operate under your control and are designed to help users work more efficiently.

- The lawful basis for this processing is performance of our contract (where AI is used to deliver core functionality) or legitimate interest (where AI enhances user productivity or service quality).
- AI features may temporarily process free-text prompts you provide, contextual business data necessary to produce a response (for example, report text or job notes), and technical metadata such as timestamps or identifiers.
- AI outputs are suggestions only; users remain responsible for reviewing and approving them. We do not use AI for decision-making that produces legal or similarly significant effects.
- System administrators can disable AI features entirely or restrict their availability to specified user roles where appropriate.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for no longer than six years after the last business transaction between us.

AI prompts and outputs are retained only as long as needed to generate the response and maintain a verifiable audit trail. They are then securely deleted or anonymised. No prompts or outputs are used to train, fine-tune, or otherwise improve any third-party AI models.

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8. How and Where Do You Store or Transfer My Personal Data?

We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR as follows.

We share your data within the group of companies of which we are a part. Where this involves the transfer of personal data outside the EEA, our group ensures that personal data is protected by requiring all companies within the group to follow the same rules with respect to personal data usage. These are known as “binding corporate rules”. More information on binding corporate rules is available from the [European Commission](#).

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- Password and security policies within our business
- Physical and electronic security measures
- Appropriately secure backup facilities.

For AI features, all processing occurs on Start Software’s own secure servers located in the UK/EU for UK/EEA tenants and Australia for AU/NZ tenants. These environments apply the same technical and organisational security measures as our main application infrastructure, including encryption in transit and at rest, strict access controls, and regular security monitoring.

9. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to one important exception.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We do **not** allow your Customer Data to be used to train third-party AI models. We may use de-identified, aggregated telemetry to improve reliability and safety.

10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11.

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There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within two weeks and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Catherine Connery):

Email address: catherine.connery@start-software.com

Telephone number: 0333 301 1010

Postal Address: e-Innovation Centre, Telford TF2 9FT

12. Google Services

If you authorise the installation of the Google Calendar Sync app, which automatically pushes appointments made in the Alpha Tracker diary to staff members’ personal Google calendars, then you are authorising the app to access the calendars and events in the calendars.

In all calendars accessible via the Google account, the app has:

- read/write access to calendars
- read/write access to events in those calendars.

This means that the Google Calendar Sync app can see, edit, share and permanently delete all the calendars accessible via the Google account, and also view and edit events on all such calendars.

No data from users’ calendars is stored or shared by the Google Calendar Sync app.

13. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available via our blog and website.