



**ITAM  
WORX**

THE SERVICES COMPANY THAT WORKS FOR YOU...

# **DATA PRIVACY POLICY**

# 1. Document Control

## Versions

Name	Role	Date	Version	Notes
Joseph Powell	Director of ITAM Worx	01/07/22	1.0	Initial Policy
Joseph Powell	Director of ITAM Worx	01/07/23	1.0	Annual review
Joseph Powell	Director of ITAM Worx	01/07/24	2.0	Annual review with changes
Michelle Jones	Director of ITAM Worx	01/07/25	3.0	Annual review with changes
Michelle Jones	Director of ITAM Worx	29/03/26	4.0	Annual review with changes

## Contacts: ITAM Worx Ltd

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## Disclaimer

Whilst every precaution has been taken in the preparation of this document, no responsibility is assumed for errors or omissions nor is any liability assumed for loss or damage resulting from the use of the information it contains, to the extent such error or omission is a result of any information, data or documents provided to *ITAM Worx Limited* by the *Customer* and relied on by *ITAM Worx Limited* in the preparation of this document.

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## 2. Introduction

ITAM Worx Ltd ("ITAM Worx", "we", "us", "our") is committed to protecting and respecting your privacy.

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

- Our website
- Our IT Asset Management (ITAM), Software Asset Management (SAM), FinOps, consultancy and managed services
- Our business operations

ITAM Worx Ltd is a company registered in England and Wales (Company Number: 14164582) with its registered office at 3 Weekley Wood Close, Kettering, Northamptonshire, United Kingdom, NN14 1UQ.

This Privacy Policy explains how we collect, use, store, and protect personal data in connection with our website, our managed services, consultancy services, and general business operations.

If you have any questions about this policy or our data practices, please contact:

Email: [governance@itamworx.com](mailto:governance@itamworx.com)

Postal address: 3 Weekley Wood Close, Kettering, Northamptonshire, United Kingdom, NN14 1UQ.

## 3. Applicable Data Protection Law

We process personal data in accordance with applicable data protection laws, including:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- Where applicable, the EU General Data Protection Regulation (EU GDPR)

Where we provide services to organisations established within the European Economic Area (EEA), processing will also comply with applicable EU data protection requirements.

## 4. Our Role: Controller or Processor

Depending on the circumstances, ITAM Worx Ltd may act as either a Data Controller or a Data Processor.

### 4.1 When We Act as a Data Processor

When we provide ITAM, SAM, FinOps, consultancy or managed services to client organisations, we act as a **Data Processor**.

In these cases:

- The client organisation is the **Data Controller**.
- We process personal data only on the documented instructions of the client.
- We do not determine the purposes for which personal data is processed.
- We process personal data solely for the purpose of delivering the contracted services.

Client data may be hosted or processed within third-party software platforms, cloud environments or systems used in connection with service delivery. Such providers act as Processors or Sub-Processors under appropriate contractual arrangements.

Where we act as a Data Processor, individuals should normally direct any data protection rights requests to the relevant Data Controller (for example, their employer or contracting organisation). We will assist the Controller in fulfilling its obligations where required by law.

### 4.2 When We Act as a Data Controller

We act as a **Data Controller** when we process personal data for our own business purposes, including:

- Website enquiries and contact forms
- Marketing communications
- Event registrations

- Supplier and partner management
- Billing and account administration
- Recruitment and HR
- General corporate administration

In these circumstances, ITAM Worx determines the purposes and means of processing.

## 5. What Is Personal Data?

“Personal data” means any information relating to an identified or identifiable natural person. An identifiable individual is one who can be identified directly or indirectly by reference to:

- A name
- An identification number
- Location data
- An online identifier (such as an IP address)
- One or more factors specific to physical, physiological, genetic, mental, economic, cultural or social identity

## 6. Categories of Personal Data We May Collect

Depending on your interaction with us, we may collect:

- **Identity Data**  
Full name, job title, employer, username or similar identifier.
- **Contact Data**  
Business email address, telephone number, billing or correspondence address.
- **Transaction Data**  
Information relating to services provided and payments.
- **Technical Data**  
IP address, browser type and version, device information, login data.
- **Usage Data**  
Information about how you use our website and services.
- **Profile Data**  
Preferences, feedback, survey responses.
- **Marketing Data**  
Your communication preferences.

We collect only personal data that is necessary and relevant to the purpose for which it is processed.

## 7. How We Collect Personal Data

We collect personal data through the following methods:

### Direct Interactions

You, your employer, or your organisation may provide personal data to us when:

- Engaging us to provide services
- Completing forms
- Corresponding with us by email, phone or post
- Attending events or meetings
- Entering into contractual arrangements

### Client Systems and Platforms

Where we provide managed services, personal data may be made available to us by client organisations through their internal systems, third-party platforms, cloud environments, or data extracts, in accordance with their instructions.

### Automated Technologies

When you use our website, we may automatically collect technical data through cookies and similar technologies. Further details are available in our Cookie Policy.

### Third Parties

We may receive business contact details from professional advisers, partners, publicly available sources, or your employer where relevant to our services.

## 8. How We Use Personal Data (Lawful Bases for Processing)

We will only use your personal data where we have a lawful basis to do so.

Where ITAM Worx Ltd acts as a Data Controller, we may process personal data in the following circumstances:

- **To perform a contract**, we have entered into with your employer, client organisation, supplier, or other business partner (or to take steps at your request before entering into such a contract);
- **Where it is necessary for our legitimate interests**, provided your interests and fundamental rights do not override those interests;
- **To comply with a legal or regulatory obligation**;
- **Where you have given consent**, where required (for example, for marketing communications and non-essential cookies).

Where ITAM Worx Ltd acts as a Data Processor, we process personal data only on the documented instructions of the relevant Data Controller, and in accordance with our contractual obligations.

## 9. Purposes of Processing

We process personal data only for specified, explicit and legitimate purposes, and not in a manner incompatible with those purposes.

### 9.1 Where We Act as a Data Controller

Where ITAM Worx Ltd acts as a Data Controller, we may process personal data for the following purposes:

- To respond to enquiries and provide requested information
- To manage client, supplier and partner relationships
- To administer contracts, billing and account management
- To provide and maintain our website
- To improve, develop and promote our services
- To send marketing communications (where permitted by law)
- To organise and manage events or webinars
- To recruit and manage personnel
- To comply with legal, regulatory and governance obligations
- To protect our business, systems, personnel and clients

Where we rely on legitimate interests as a lawful basis, we ensure that our interests are balanced against your rights and freedoms.

### 9.2 Where We Act as a Data Processor

Where we act as a Data Processor on behalf of a client organisation, we process personal data solely for the purpose of delivering contracted ITAM, SAM, FinOps, consultancy or managed services.

In such cases:

- The purposes of processing are determined by the relevant Data Controller;
- Processing is carried out only on documented instructions;
- Processing is governed by contractual arrangements, including data processing agreements where required.

We do not use client personal data for our own independent purposes.

## 10. Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason.

## 11. Marketing

We may send marketing communications where:

- You have requested information from us
- You have consented to receive marketing
- We have a legitimate interest in promoting relevant services (where permitted by law)

You may opt out of marketing communications at any time by:

- Clicking the unsubscribe link in emails if applicable; or
- Contacting [governance@itamworx.com](mailto:governance@itamworx.com)

We do not sell personal data to third parties.

## 12. Cookies

Our website uses cookies and similar technologies.

Some cookies are strictly necessary for the operation of our website. Others, including analytics and marketing cookies, are used only with your consent where required by law.

You can manage your cookie preferences through our cookie consent mechanism and settings tool.

You can also set your browser to refuse all or some cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or may not function properly.

[Cookie Policy](#)

## 13. Disclosure of Personal Data

We may share personal data with:

- IT service providers and hosting providers
- Professional advisers (e.g., legal, accounting)
- Business partners where relevant to service delivery
- Regulators and authorities where required by law
- Third parties in connection with a corporate transaction (e.g., merger or acquisition)

Where we use third-party service providers, we require them to process personal data in accordance with applicable data protection law and appropriate contractual safeguards.

## 14. International Transfers

Personal data may be transferred outside the United Kingdom and/or European Economic Area.

Where this occurs, we ensure appropriate safeguards are in place, including:

- Transfers to countries recognised as providing an adequate level of protection
- EU Standard Contractual Clauses (SCCs)
- UK International Data Transfer Agreement (IDTA)
- UK Addendum to EU SCCs
- Appropriate technical and organisational security measures
- Transfer risk assessments where required

Further information about safeguards may be obtained by contacting us.

## 15. Information Security

We are committed to keeping your personal data secure. We implement appropriate technical and organisational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access.

Access to personal data is limited to employees, contractors and third parties who have a legitimate business need to know. Such persons will only process personal data on our instructions and are subject to confidentiality obligations.

We maintain internal policies and procedures for identifying, managing and reporting personal data breaches. Where required under applicable data protection law, we will notify relevant supervisory authorities and affected individuals within the required timeframes. Where we act as a Data Processor, we will notify the relevant Data Controller in accordance with our contractual obligations.

Technical Controls in Place:

- TLS 1.2/1.3 for data in transit
- encryption at rest
- RBAC + MFA for admin access
- logging/monitoring
- vendor risk management / sub processor controls

## 16. Data Retention

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including:

- Contractual obligations
- Legal and regulatory requirements
- Legitimate business needs

Retention periods are determined based on the nature, sensitivity, and legal requirements applicable to the data.

## 17. Your Rights

Under applicable data protection law, you may have the right to:

- Access your personal data
- Request correction of inaccurate data
- Request erasure (where applicable)
- Object to processing
- Request restriction of processing
- Request data portability
- Withdraw consent (where processing is based on consent)

To exercise your rights, please contact: [governance@itamworx.com](mailto:governance@itamworx.com)

Where we act as a Data Processor, you should normally direct requests to the relevant Data Controller.

## 18. Complaints

You have the right to lodge a complaint with:

Information Commissioner's Office (ICO) [www.ico.org.uk](http://www.ico.org.uk)

If you are located within the EEA, you may lodge a complaint with your local supervisory authority.

We would, however, welcome the opportunity to address your concerns before you approach a supervisory authority.

## **19. Changes to This Privacy Policy**

We may update this Privacy Policy from time to time. The most current version will always be available on our website.