

Privacy Policy

Seastorm Limited

Seastorm Limited ("Seastorm", "we", "us", etc.) considers your privacy to be very important. We will therefore process and use your data in a secure manner in accordance with the UK General Data Protection Regulations (GDPR) and other applicable laws and regulation. In this document we set out how and why we use your information.

Seastorm is a limited company registered in England and Wales, with company number 11867862. You can contact us on hello@seastorm.co with any questions or concerns.

Scope of this Policy

This policy relates to Seastorm business activities. This policy applies when you work with Seastorm directly (as a supplier, including contractors, or as a customer). Seastorm directly offers a number of products and services itself; for each of these where Seastorm processes data we publish a separate policy related to the activities relevant to that particular product or service, which can be found in the documentation specific to that product or service.

As such, this policy applies to the following scenarios:

- When you visit our website (<https://seastorm.co> or its subdomains);
- When you contact us via email or another mechanism;
- When you engage us in a project or consultancy agreement;
- When you are employed or contracted by us;
- During billing processes (e.g. invoicing, payments, etc.);
- For business-business sales processes;
- For other purposes not covered by our other products and service offerings.

Unless otherwise stated, Seastorm acts as Data Controller over the primary data processing described in this policy. We have a Data Protection Officer, who can be reached by emailing dpo@seastorm.co.

Cookies

Our website does not use cookies to track visitors to the site. However, functional essential cookies are used by our live chat technology in order to discern you from other visitors.

What Data do we Collect?

In this section we identify the key points at which we collect data, and the purpose for the collection.

When you visit our website(s)

When you visit our website(s) using a web browser, we collect some data about your computer and the way our services are used by you, even if you don't have an account. We do not collect your name or other personal details about you at this stage, but we may process information such as your computing device's information (including your OS and IP address) and details about your

browser and where you arrived from. We do this for observing aggregated usage of our services, so that we can better understand how to improve our services for their audiences. The legal basis for processing this data is a legitimate interest in recording aggregated analytics data for improvement purposes and to see how often people visit our website.

When you email (or contact) us

When you email us (or contact us via a contact form or similar mechanism) we will be able to view your email address and the content you send us in the message (including your name, if this is included). This information is securely stored by our mail provider (Google) and is done so to enable us to respond to your query and to follow-up with relevant content. The legal basis for processing this data is a legitimate interest in responding to enquiries, maintaining business communications, or customer service (as relevant).

When we engage with you (or you, us) in a project or consultancy agreement

If you are a customer buying products or services from us, we may collect and store (through emails, note-taking, agreements, etc.) the names and business email addresses of the people or team we work with. This enables us to keep in touch with the project partners throughout the project, for ongoing communications and meetings, and to maintain the business relationships.

If you are a contractor to us (i.e. where you provide services to us as a supplying contractor), we may request, process, and store personal data about you, such as your name, contact details (such as email address, address, and phone number), CV, and any other information required for the project or contract role. A copy of official or government ID may also be provided to us for identity verification purposes. In such cases, any such copies are immediately destroyed from all systems once this verification has taken place. Upon termination of contract, unless otherwise agreed or where there is a legal obligation to do so, any such personal data is returned or destroyed. Such personal data is processed to allow us to be able to work with you and communicate with you.

In either case, the legal basis for processing this data is a legitimate interest in maintaining business communications, contractual fulfilment (so we can pay you and contact you, etc.).

When we employ you

If you are employed by us, we may request, process, and store personal data about you, such as your name, contact details (such as email address, address, and phone number), CV, and any other information required for your role or that we are legally required to collect (which may include National Insurance details for pension, PAYE, or student loan repayments). A copy of official or government ID may also be provided to us for identity verification purposes. In such cases, any such copies are immediately destroyed from all systems once this verification has taken place. Upon termination of employment, unless otherwise agreed or where there is a legal obligation to do so, any such personal data is returned or destroyed. Such personal data is processed to allow us to be able to work with you, employ you, pay you, and other legal or operational obligations.

The legal basis for such processing is contractual fulfilment (so we can pay you, contact you, and meet other contractual demands), legal obligation (for HMRC/legal purposes, right-to-work documentation, health and safety, pension, etc.), and legitimate interests, where relevant (e.g. additional background checks, security monitoring, etc.).

During billing or payment processes

If you are a supplier or staff (including contractors), we may need to collect your payment details (such as bank account number, sort code, and business or individual name). This allows us to pay you and to record your details as a “previous payee” to enable us to continue to pay you.

If we are selling a service to you, we will collect billing information (name, business email, business address, etc.) in order for us to generate an invoice to send to you for payment. Such invoices are kept for tax and other legal requirements. The legal basis for such processing is contractual fulfilment.

For business-to-business marketing

From time-to-time we collect information from third parties for the purposes of commercial interest. This information is limited to business contacts, and may include name, job title, business email, company name, and other relevant business information. This information is collected from the internet (e.g. your website) and publicly-available databases.

Information collected in this way may be used for marketing. For example, we might use the information to email your business about relevant products or services that the organisation might find interesting or useful. During such outreach, we endeavour to limit contact to purely business, rather than personal, contacts.

This information is kept securely in our office software. The legal basis for such processing is a legitimate interest in maintaining/building business relationships.

Subprocessors

We work with selected subprocessors to help run our business, as described below.

Google: We use Google services for our mail and office software. Your information may be stored on Google systems if you email us or if we record your business information for business purposes.

Monzo: We use Monzo bank software to store payment details for the purposes of invoicing, and for paying our bills.

Xero: We use Xero for bookkeeping. Sales and payment data may be stored in our Xero account for the purposes of handling invoices and other bookkeeping activity.

Please note that this list of subprocessors may change from time to time.

Who can Access your Data?

Seastorm staff (including employees, contractors and sub-processors) relevant to your engagement with us, project or communication may have access to your personal data (including your name and email address) as required or appropriate to their own role.

We may be required to provide data to legal authorities if we receive such a request or warrant. If Seastorm is purchased or otherwise has its control transferred to another organisation or body,

then data we hold will also be transferred to the new business controller. However your data will still only be used for the same purpose for which it was originally supplied to us. In any case, we act and will take steps with the aim of ensuring your privacy is protected.

How Long do we Keep Data for?

We keep data for as long as is required in order to deliver a project, handle communications and sales, deliver and maintain contracts, employ you, or as required for legal or other purposes. When there is no longer a legal basis to maintain such data, it will be securely deleted according to our security policies.

Where is your Data Stored and Processed?

Data is stored on our own servers, or those of our subprocessors, as outlined above. Our own servers are based in the UK.

How do we Protect your Data?

Your data is well-protected. We use industry grade business practices to help prevent against unauthorised access and staff are trained to be secure in their day-to-day work. This includes encryption of your data in-transit and at-rest.

We carefully check and vet subprocessors in order to ensure that their own data protection processes are sufficient, and maintain a range of security policies that apply to staff and contractors.

Child Safety

Children under the age of 16 are not allowed to use our services or to directly provide us with personal data. As such, we do not knowingly store or process personal data relating to children under the age of 16.

Your rights

As an individual, you have rights with regard to personal data processed by us. Should you wish to exercise any of these rights then please get in touch with the email address shown on this policy. We will endeavour to action any rights within one business week.

Right to access

At any time you have the right to know about any personal data we hold about you.

Right to correct

You have the right to have your personal data corrected or updated or deleted.

Right to object

You have the right to object to us processing your data.

Right to data transfer

You have the right to request your data in a sensible format such that it can be transferred to a different provider or system.

Rights relating to automated processing

If you feel you are being affected by us carrying out actions as a result of an automated process, to which you object to, you can object. We do not use automated decision making in a way that will affect an individual.

Withdrawal of consent

If you have provided consent for us to process your data, you can withdraw this consent at any time by emailing us.

Complaints

If you would like to complain about the way in which we have handled your personal data, about this policy, or more broadly about data protection, then please get in touch with us in the first instance by emailing our dedicated data protection address: dataprotection@seastorm.co. Ensure your email contains enough information to enable us to handle and respond to your complaint.

Under the Data (Use and Access) Act 2025, we will acknowledge your complaint within 30 days and take appropriate steps to investigate and handle the complaint without undue delay. It may be we need to respond to you in order to request additional information, clarification, or details.

We will keep you updated throughout the process and notify you of any outcomes or actions taken as a result of your complaint.

Whilst you should make every effort to follow our own complaints process first, you may also (or subsequently) escalate your complaint to the UK's Information Commissioner's Office (ICO). For example, this might happen if you are not satisfied with our response or the way we have handled your complaint. Please use the following link to complain to the ICO: <https://ico.org.uk/make-a-complaint>.