



Espok IT Solutions – Privacy Notice

1. Information About Us

Espok IT Solutions Limited

Registered in England and Wales (Company No. 9270946)

Registered Address:

Warlies Park House

Horseshoe Hill

Waltham Abbey

Essex

EN9 3SL

VAT Number: 198 5153 67

Data Protection Officer (DPO): Amit Laxhman

Email: amit.laxhman@espok.co.uk

Telephone: 0330 174 9900

ICO Registration Number: ZA371429

Espok IT Solutions Limited acts as a **Data Controller** for its own business operations and as a **Data Processor** when delivering managed IT and cloud services on behalf of its clients.

2. What Does This Privacy Notice Cover?

This Privacy Notice explains how Espok IT Solutions Limited collects, uses, stores, shares, and protects personal data. It also outlines the rights of individuals under data protection legislation.

This notice is provided in accordance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- NHS Data Security and Protection Toolkit (DSPT)

3. What Is Personal Data?

Personal data means any information relating to an identified or identifiable living individual.

This may include, but is not limited to:

- Names and contact details
- Job titles and business contact information
- Electronic identifiers such as IP addresses and device IDs
- Service-related communications and support records

Espok does not knowingly process special category data unless instructed to do so by a client under a contractual agreement and formal Data Processing Agreement (DPA).

4. Lawful Bases for Processing

Espok processes personal data under one or more of the following lawful bases:

- **Contractual necessity** – to deliver services agreed with clients
- **Legal obligation** – compliance with applicable laws and regulations
- **Legitimate interests** – service delivery, security, and operational resilience
- **Consent** – where explicitly required

5. Data Subject Rights

Individuals have the following rights under UK GDPR:

- Right of access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to object
- Right to data portability
- Right to lodge a complaint with the Information Commissioner's Office (ICO)

Espok does not carry out automated decision-making or profiling.

Where Espok acts as a Data Processor, requests will be supported and coordinated with the relevant Data Controller.

6. Personal Data We Process

Depending on the relationship with Espok, personal data processed may include:

- Name
- Business address
- Email address
- Telephone number
- Organisation name
- Job title
- Service and support metadata (for example, helpdesk tickets, audit logs, and access records)

7. How We Use Personal Data

Personal data is used solely for legitimate business purposes, including:

- Delivering managed IT and cloud services
- Account setup, administration, and support
- Security monitoring and incident response
- Business communications
- Compliance with legal and regulatory requirements

Personal data is never sold or used for unsolicited marketing.

8. Data Sharing

Personal data may be shared with:

- Trusted third-party suppliers and sub-processors (such as Microsoft and security service providers)
- Regulatory or law-enforcement authorities where required by law

All third parties are subject to contractual data protection and confidentiality obligations.

9. Data Retention

Personal data is retained only for as long as necessary to fulfil contractual, legal, or regulatory obligations.

Retention periods are defined within Espok's internal data retention schedule and reviewed annually.

Secure deletion and disposal methods are used when data is no longer required.



10. Data Security

Espok implements appropriate technical and organizational measures to protect personal data, including:

- Encryption of data at rest and in transit
- Role-based access control and least-privilege access
- Multi-factor authentication
- Endpoint and email security controls
- Regular patching and vulnerability management
- Security incident management procedures

Detailed security controls are available on request.

11. International Data Transfers

Espok does not routinely transfer personal data outside the United Kingdom.

Where international processing occurs (for example through cloud service providers), appropriate safeguards are in place, including UK adequacy decisions and Standard Contractual Clauses (SCCs).

12. Accessing Your Personal Data

Requests relating to personal data, including Subject Access Requests (SARs), should be submitted to the Data Protection Officer using the contact details above.

Requests will be responded to within one calendar month, in accordance with UK GDPR.

13. Changes to This Privacy Notice

This Privacy Notice is reviewed annually or upon any material change to legislation, business operations, or data processing activities.

Last reviewed by: Amit Laxhman