

# NCCO INTERNATIONAL LIMITED

## Privacy Notice

Issued under the UK General Data Protection Regulation and the Data Protection Act 2018

Version 2.0 | April 2026

### 1. Important Information and Who We Are

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#### Purpose of This Privacy Notice

We respect your privacy and are committed to protecting your personal data. This privacy notice explains how NCCO International Limited collects, uses, stores and otherwise processes your personal data when you visit or use our website (<https://www.ncco.eu>), purchase a product, sign up to receive information about our products, or use our customer services. It also tells you about your rights and how data protection law protects you.

This website is not intended for children and we do not knowingly collect data relating to children under the age of 13.

Please read this privacy notice carefully. It may be updated from time to time and we will notify you of any material changes. This notice supplements any other privacy or fair processing notices we may issue and is not intended to override them.

#### Controller

NCCO International Limited is the data controller responsible for your personal data (referred to as "NCCO", "we", "us" or "our" in this notice).

We have appointed a Data Privacy Manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions, including any requests to exercise your legal rights, please contact our Data Privacy Manager:

<b>Email</b>	dataprotection@ncco.com
<b>Post</b>	NCCO International Limited, Units A3–A4 Beeches Park Eastern Avenue, Burton-On-Trent, Staffordshire, DE13 0BB
<b>Regulator</b>	Information Commissioner's Office (ICO): <a href="http://www.ico.org.uk">www.ico.org.uk</a>

You have the right to make a complaint at any time to the ICO. We would, however, appreciate the opportunity to address your concerns first, so please contact us in the first instance.

## Changes to This Privacy Notice

This version was last updated in April 2026 and replaces all earlier versions. We will post updates on our website and, where changes are significant, notify you directly. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## Third-Party Links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links may allow third parties to collect or share data about you. We do not control those third-party sites and are not responsible for their privacy notices. We encourage you to read the privacy notice of every website you visit.

## 2. The Data We Collect About You

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Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data) or data relating to a company that does not also identify a living individual.

We may collect, use, store and transfer the following categories of personal data about you:

- Identity Data – first name, last name, username or similar identifier, title, date of birth and gender.
- Contact Data – billing address, delivery address, email address and telephone numbers.
- Financial Data – bank account and payment card details.
- Transaction Data – details about payments to and from you and details of products and services purchased.
- Technical Data – internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- Profile Data – your username and password, purchases or orders, interests, preferences, feedback and survey responses.
- Usage Data – information about how you use our website, products and services.
- Marketing and Communications Data – your preferences in receiving marketing and other communications from us and our affiliated companies.

We also collect, use and share Aggregated Data (for example, statistical or demographic data) for any purpose. Aggregated Data is not considered personal data in law as it does not directly or indirectly reveal your identity. However, if we combine Aggregated Data with your personal data so that it can identify you, we treat the combined data as personal data.

## Special Categories of Personal Data

*We do not collect any Special Categories of Personal Data about you (including details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, health, genetic or biometric data). Nor do we collect any information about criminal convictions or offences.*

## If You Fail to Provide Personal Data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform that contract. In this case, we may have to cancel a product or service, but we will notify you if this is the case.

## 3. How Is Your Personal Data Collected?

### Direct Interactions

You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise, including when you:

- place an order for our products or services;
- create an account on our website;
- subscribe to our newsletter;
- request marketing to be sent to you;
- request a sales representative to contact you;
- sign up for a product demonstration; or
- contact our customer services or provide feedback.

### Automated Technologies or Interactions

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this data by using cookies, server logs and similar technologies. Please see our Cookie Policy for further details.

### Third Parties or Publicly Available Sources

We may receive personal data about you from the following third parties:

- Analytics providers such as Google, based outside the UK/EEA;
- Advertising networks including Google Ads, LinkedIn, Meta (Facebook/Instagram) and X (formerly Twitter), based outside the UK/EEA;
- Search information providers such as Google, Bing and Yahoo, based outside the UK/EEA; and
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register, based within the UK.

## 4. How We Use Your Personal Data

We will only use your personal data when the law allows us to. The lawful bases we most commonly rely on are:

- Contract: where we need to perform a contract we are about to enter into or have entered into with you.
- Legitimate Interests: where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Legal Obligation: where we need to comply with a legal or regulatory obligation.
- Consent: we rely on consent only for sending third-party direct marketing to you by email or text message. You may withdraw consent at any time by contacting us.

The table below describes all the ways we plan to use your personal data and the lawful basis we rely on for each purpose.

Purpose / Activity	Type of Data	Lawful Basis for Processing
Register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you

Process and deliver your order including managing payments, fees and charges; and collecting and recovering money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Legitimate interests (to recover debts due to us)
Manage our relationship with you including notifying you about changes to our terms or privacy notice and asking you to leave a review or complete a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Legal obligation (c) Legitimate interests (to keep records updated and study how customers use our products/services)
Enable you to enter a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Legitimate interests (to develop our products/services and grow our business)
Administer and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support and hosting)	(a) Identity (b) Contact (c) Technical	(a) Legitimate interests (for running our business, providing IT services, network security and preventing fraud) (b) Legal obligation
Deliver relevant website content and advertisements to you and measure or understand the effectiveness of our advertising	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
Use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, and to develop our business)
Make suggestions and recommendations to you about goods or services that may be of interest	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Legitimate interests (to develop our products/services and grow our business)

## Marketing

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what products, services and offers may be of interest to you. You will receive marketing communications from us if you have registered your details with us and have requested information about our goods or services.

## Opting Out

You can ask us to stop sending marketing messages at any time by emailing us at [datacontrol@ncco.com](mailto:datacontrol@ncco.com), by following the unsubscribe link on any marketing message, or by contacting us using the details in Section 1. Opting out of marketing does not affect personal data we process for other lawful purposes such as fulfilling your orders.

## Cookies

We use cookies and similar tracking technologies to distinguish you from other users, to remember your preferences, to improve our services and to analyse website traffic. We will only set cookies that are not strictly necessary for the operation of our website after you have given your consent through our cookie consent banner. You may withdraw your consent or change your cookie preferences at any time by clicking the cookie settings link on our website. For full details, please see our Cookie Policy.

## 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 that is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis that allows us to do so.

## 5. Disclosures of Your Personal Data

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We may share your personal data with the following parties for the purposes set out in Section 4 above:

- **NCCO Group Companies:** Other companies within the NCCO Group, including our parent company based in the United States of America, which provide IT and system administration services and undertake leadership reporting.
- **UK-based Service Providers:** External IT and system administration service providers acting as processors and based in the United Kingdom.
- **Professional Advisers:** Lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- **Regulators and Authorities:** HM Revenue & Customs, the ICO and other UK authorities who require reporting of processing activities in certain circumstances.
- **Business Transfers:** Third parties to whom we may sell, transfer or merge parts of our business or assets. The new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process it for specified purposes and in accordance with our instructions.

## 6. International Transfers

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We share your personal data within the NCCO Group. This involves transferring your data outside the United Kingdom (UK), in particular to our parent company based in the United States of America (USA). Some of our external third-party service providers are also based outside the UK, so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure that an appropriate level of protection is afforded to it. We rely on the following safeguards:

### Transfers to the United States

*Transfers of personal data to our parent company in the USA are made on the basis that our parent company is registered under the UK Extension to the Data Privacy Framework (UK-US DPF) with the US Department of Commerce. The UK-US DPF was approved by the UK Government and ensures that registered US organisations provide a level of data protection equivalent to that required under UK data protection law.*

Our parent company has self-certified its adherence to the UK-US DPF Principles. You can verify its registration at the US Department of Commerce's Data Privacy Framework website: [www.dataprivacyframework.gov](http://www.dataprivacyframework.gov).

If the UK-US DPF ceases to be available, or our parent company ceases to be registered under it, we will implement alternative lawful safeguards for such transfers. These may include use of the International Data Transfer Agreement (IDTA) or the UK Addendum to the EU Standard Contractual Clauses, both approved by the ICO.

## Transfers to Other Third Countries

For transfers to countries outside the UK that are not covered by the UK-US DPF or a UK adequacy regulation, we rely on one or more of the following:

- International Data Transfer Agreements (IDTA): ICO-approved contracts which give personal data the same protection it has in the UK; or
- UK Adequacy Regulations: Transfers to countries deemed to provide an adequate level of protection for personal data by the UK Government.

Please contact us if you would like further information on the specific safeguard mechanism used when transferring your personal data outside the UK.

## 7. Data Security

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We have put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator (including the ICO) of a breach where we are legally required to do so, without undue delay and, where feasible, within 72 hours of becoming aware of it.

## 8. Data Retention

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### How Long Will We Retain Your Personal Data?

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process it, and the applicable legal requirements.

By law, we are required to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax and accounting purposes.

Details of retention periods for different aspects of your personal data are available in our Retention Policy, a copy of which you may request by contacting our Data Privacy Manager using the details in Section 1.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 9. Your Legal Rights

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Under the UK GDPR and the Data Protection Act 2018, you have the following rights in relation to your personal data. There is generally no fee for exercising these rights; however, we may charge a reasonable fee or refuse to act on a request that is clearly unfounded, repetitive or excessive.

Right	What It Means
<b>Right of Access</b>	You may request a copy of the personal data we hold about you (known as a Subject Access Request) and to check that we are lawfully processing it.
<b>Right to Rectification</b>	You may ask us to correct any incomplete or inaccurate personal data we hold about you, though we may need to verify the accuracy of the new data you provide to us.
<b>Right to Erasure</b>	You may ask us to delete or remove personal data where there is no good reason for us continuing to process it, subject to certain legal exceptions which will be notified to you at the time of your request.
<b>Right to Object</b>	You may object to processing based on legitimate interests or for direct marketing purposes. We will cease processing unless we can demonstrate compelling legitimate grounds that override your interests and rights.
<b>Right to Restrict Processing</b>	You may ask us to suspend the processing of your personal data in certain circumstances, for example while we verify its accuracy or establish whether we have legitimate grounds to process it.
<b>Right to Data Portability</b>	You may request that we transfer your personal data to you or a third party in a structured, commonly used, machine-readable format, where we process it by automated means and the basis is your consent or a contract.
<b>Right to Withdraw Consent</b>	Where we rely on consent to process your personal data, you may withdraw that consent at any time. This does not affect the lawfulness of processing carried out before withdrawal.
<b>Right to Lodge a Complaint</b>	You have the right to lodge a complaint with the ICO at any time: <a href="http://www.ico.org.uk">www.ico.org.uk</a>   Tel: 0303 123 1113.

## How to Exercise Your Rights

To exercise any of the rights set out above, please contact our Data Privacy Manager using the details in Section 1. We will respond to all legitimate requests within one month. Occasionally it may take us longer if your request is particularly complex or you have made a number of requests; in that case we will notify you and keep you updated.

We may need to verify your identity before we can respond to your request. This is a security measure to ensure that personal data is not disclosed to anyone who has no right to receive it.

*This privacy notice was last updated in April 2026 (Version 2.0) and replaces all previous versions.  
NCCO International Limited | Units A3–A4 Beeches Park Eastern Avenue, Burton-On-Trent, Staffordshire, DE13 0BB  
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