



COACTIVEICT[®]
YOUR PROACTIVE PARTNER

Privacy Policy

Specialists in
**Managed Security, IT &
Communication Solutions**

1. Who We Are

Coactive ICT Limited ("Coactive", "we", "us") is the controller of the personal information described in this policy.

Company Number	06985618 (registered in England and Wales)
Registered Office	Unit 66 Hillgrove Business Park, Nazeing Road, Nazeing, England, EN9 2HB
ICO Registration Number	ZA066946
Privacy Contact	info@coactiveict.com
Phone	0330 2000 554

This policy covers our customers, prospective customers, suppliers and website visitors. It does not cover our staff, who receive a separate notice.

2. What We Collect & Why

What We Use	Why	Lawful Basis
Contact, account and billing details	To provide support and bill for our services	Contract (sole traders and partners), legitimate interests (company contacts), legal obligation (tax records)
Call records, usage, device and location data, and support tickets	To connect calls, bill accurately, fix faults and prevent fraud	Contract, legitimate interests, legal obligation
Call recordings	Training, quality and resolving disputes	Legitimate interests
Credit check results	To decide whether to offer credit terms	Legitimate interests
Marketing preferences	To send relevant business marketing	Legitimate interests, or consent where required
Website and cookie data	To run and improve our website	Legitimate interests, consent for non-essential cookies

Most information comes from you or your organisation. We also receive it from network suppliers, credit reference agencies, payment partners and public sources such as Companies House.

We do not use call, usage or location data for marketing without your consent. For mobile services, location data is used only to route calls and data, locate 999 and 112 callers, bill you, prevent fraud and meet legal obligations. We only list your number in public directories if you ask us to. If you do not give us information we need to provide a service, or that the law requires, we may not be able to provide it.

3. When We Act For Our Customers

When we provide phone systems, IT support and managed IT services, cyber security products and services, bulk SMS or on hold messaging, we may handle information on behalf of our customers, including their staff's data held in the systems we manage. In these cases, our customer is the controller and we are their processor, acting only on their instructions under the data processing terms in our [Terms and Conditions](#).

Customers can request our list of sub-processors. Some security products we supply send threat and device data to the product vendor, which may use it as a separate controller under its own privacy notice.

If you work for one of our customers, your employer decides what is monitored on its systems and is

responsible for telling you.

4. Marketing

We send business marketing to contacts at companies and public bodies, and to sole traders and partnerships only where they have agreed or are existing customers. We screen sales calls against the TPS and Corporate TPS. You can opt out at any time using the unsubscribe link or our privacy contact. We never sell your information.

5. Who We Share It With

We share only what is needed with:

- network operators and wholesale providers **[e.g. Openreach, BT Wholesale]**
- cloud, telephony, IT management, backup, CRM, billing and SMS platforms that help us run our services
- payment, merchant service, credit reference and fraud prevention partners
- professional advisers, insurers and debt recovery agencies
- regulators, HMRC and the police where the law requires it
- a buyer of or investor in our business, under confidentiality

Where these suppliers store data outside the UK, we use UK approved safeguards such as adequacy regulations or the UK International Data Transfer Agreement.

6. How Long We Keep It

We keep contract and billing records for 6 years after the contract ends, and we hold call data and usage data for no longer than 12 months. In certain circumstances for compliance purposes some clients may purchase products which extends the length of time we hold their data.

Marketing data is kept for 36 months from last contact. Customer data we hold as processor is returned or deleted at the end of the contract, as the customer instructs. We then securely delete or anonymise information.

7. How We keep It Safe

We hold a Cyber Essentials certification and use access controls, multi factor authentication, encryption and logged remote access. Where required, we report data breaches to the ICO within 72 hours, and we tell affected customers and individuals without undue delay.

8. Your Rights

You can ask us to access, correct, erase or restrict your information, object to how we use it, receive a copy in a portable format, or withdraw consent. You can object to direct marketing at any time. Contact our privacy contact in section 1. We respond within one month and there is usually no charge.

If you are unhappy, please tell us first. You can also complain to the Information Commissioner's Office at ico.org.uk/make-a-complaint or on 0303 123 1113.

9. Cookies & Changes

We do not make decisions about you based solely on automated processing. Non-essential cookies are only set with your consent. See our [Cookie Policy](#). We may update this policy, including if the ownership of our business changes, and will tell customers about significant changes.

Last updated: 07/10/2026