

PRIVACY POLICY

Last Updated: July 2026

This privacy policy sets out how **Blue Castle Tech Ltd** collects, uses, stores, and protects any personal data (also referred to as "personal information" or "personally identifiable information") that you provide to us, or that we collect about you.

We are committed to protecting your privacy in compliance with all applicable global data protection laws, including the UK General Data Protection Regulation (UK GDPR), the Data (Use and Access) Act, the Privacy and Electronic Communications Regulations (PECR), the EU General Data Protection Regulation (EU GDPR), and applicable United States state privacy laws (including the California Consumer Privacy Act/CCPA, as amended).

1. Important Information and Who We Are

Blue Castle Tech Ltd is a company registered in England and Wales (Company Number: 17309830) and acts as the "data controller" for the personal data we collect.

Contact Details

- **Legal Entity:** Blue Castle Tech Ltd
- **Registered Office:** 71 to 75 Shelton Street, Covent Garden, London, WC2H 9JQ
- **Dedicated Privacy Email:** privacy@bluecastletech.com

For European Union Residents (EU Representative)

Because we operate outside of the European Economic Area (EEA) but process the data of individuals inside the EU, you may direct inquiries regarding our EU GDPR compliance to our privacy team at privacy@bluecastletech.com for processing via our digital point of contact.

2. The Data We Collect About You

Depending on how you interact with us, we may collect and process the following categories of data:

- **Identity Data:** First name, last name, job title, and employer/company name.
- **Contact Data:** Corporate email address, telephone number, and business address.
- **Technical Data:** Internet protocol (IP) address, browser type, time zone setting, operating system, and location data when you visit our website.
- **Commercial & Usage Data:** Information about how you use our website, products, and services, as well as records of products or services considered or purchased.

We **do not** collect any Sensitive Personal Information (e.g., race, ethnicity, health data, political opinions) or biometric data.

3. How We Collect Your Personal Data

- **Direct Interactions:** You provide your Identity and Contact Data by filling in forms on our website, subscribing to our services, or communicating with us directly.
 - **Third Parties & Publicly Available Sources:** To support our business-to-business (B2B) lead generation, we collect professional personal data from public sources and commercial vendors, including:
 - Publicly accessible corporate directories, registries, and company websites.
 - Professional networking platforms (such as LinkedIn).
 - Third-party commercial lead databases.
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4. How We Use Your Personal Data & Our Legal Basis

UK & EU Frameworks: Legitimate Interests

For UK and EU residents, we rely on **Legitimate Interests** as our lawful basis to process professional Identity and Contact Data for business-to-business (B2B) direct marketing.

We have conducted a balancing test and determined that our commercial interest in introducing our services to relevant professionals does not override your fundamental privacy rights. We ensure our outreach is highly targeted to your professional role and provide an immediate, frictionless way to opt out.

US Frameworks: Consent and Opt-Out

For US residents, we process your information to pursue our legitimate business goals. Where required by state laws, we provide a clear right to opt out of the use of your data for targeted advertising or commercial outreach at any time.

5. Sharing and "Selling" of Data

We do not sell your personal data for money. However, under certain US state definitions (like the CCPA), sharing data with third-party analytics tools or marketing partners via cookies can technically be classified as a "sale" or "sharing" of data.

We may share your data with trusted data processors to run our business:

- Cloud storage, CRM software, and email deployment providers (e.g., HubSpot, Google Workspace).
- Professional advisers, including lawyers, auditors, and insurers.

International Data Transfers

As a UK-based business doing business in the US and EU, your data will be transferred across international borders. Whenever we transfer personal data out of the UK or EEA, we ensure standard contractual clauses (SCCs) or the UK International Data Transfer Agreement (IDTA) are in place to guarantee your data receives an equivalent level of protection.

6. Data Retention & Suppression Lists

We only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including any legal or accounting requirements.

- **For Marketing Leads:** If you object to our processing or unsubscribe from our emails, we remove your data from our active marketing pipelines. We will retain your email address on a permanent **suppression list** to ensure we honor your opt-out request and never contact you again.
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7. Your Privacy Rights (Global)

Depending on your location (UK, EU, or specific US States), you hold some or all of the following legal rights regarding your data:

- **Right to Access / Know:** You can request a copy of the personal data we hold about you.
- **Right to Correction:** You can request that we update or fix inaccurate data.
- **Right to Erasure / Deletion:** You can request that we delete your personal data.
- **Right to Object / Opt-Out:** You have an **absolute right** to object to your data being used for direct marketing or targeted advertising.
- **Right to Non-Discrimination:** We will never discriminate or deny services to you for exercising any of your privacy rights.

To exercise any of these rights, please email us at privacy@bluecastletech.com. We respond to all verified requests within the statutory timeframes (30 days for UK/EU, 45 days for US states).

8. Complaints and Dispute Resolution

UK Internal Complaints Process

In accordance with the UK Data (Use and Access) Act, we operate a formal internal process for handling data protection complaints:

1. Please submit your complaint in writing to privacy@bluecastletech.com.
2. We will formally acknowledge your complaint within **30 days**.
3. We will investigate the issue thoroughly and provide our findings and resolutions without undue delay.

Regulatory Authorities

- **UK:** You have the right to lodge a complaint with the Information Commissioner's Office (ICO) at www.ico.org.uk.
- **EU:** You have the right to lodge a complaint with your local National Data Protection Authority (DPA).
- **US:** You have the right to appeal any request decisions by contacting your state's Attorney General office.