

COMPLIVOLVE PRIVACY POLICY

SaaS Compliance for Adult Social Care

Complivolve Ltd: Privacy Policy

Last updated: 05 April 2026

1. Who We Are

For the purposes of the UK General Data Protection Regulation ("UK GDPR") and the Data Protection Act 2018 ("DPA 2018"), the data controller is:

Complivolve Ltd A private limited company incorporated in England and Wales Registered Office (from incorporation): 86-90 Paul Street, London, EC2A 4NE Company Number: 16865216 Email: info@complivolve.com

Complivolve Ltd is the data controller or processor (as appropriate) and is referred to as "we", "us", or "our".

Complivolve provides a cloud-based software-as-a-service platform for CQC-regulated adult social care providers, enabling management of compliance, workforce records, audits, incident reporting, and regulatory documentation.

2. How to Contact Us

Email: info@complivolve.com Postal address: Complivolve Ltd 86-90 Paul Street London EC2A 4NE

3. Purpose of This Privacy Policy

This Privacy Policy explains how we collect, use, store, and share personal data when you interact with the Complivolve platform (the "**Complivolve Platform**") or communicate with us.

4. What Personal Data do We Collect or Process?

We may collect, use, store and transfer different kinds of personal data in relation to visitors to our website, or our customers or prospective customers of the Complivolve Platform. The types of personal data which we control or process are as set out below:

- **Admin Data:** including first name, last name, username, title, email address, telephone numbers.
- **Customer and Service User Data:** content uploaded to the Complivolve Platform including, but not limited to:

- o Employee:

- § Training records;

- § Qualification records;

- § DBS/Right-to-Work documentation (which may include criminal offence data)

- § Occupational health clearances

§ Immunisation certificates

§ Registration Certificates

§ Next of Kin data (name – address – phone – email –relationship)

§ Staff reference data — name, contact details, and reference content provided by or relating to employment referees.

§ Electronic signature data captured during sign-off of supervisions, appraisals, exit interviews, and incident witness statements.

o Service User:

§ Special category health data included in any incident reports

o Operational Data:

§ Personal data included in incidents including employee data, service user data, and witnesses of incidents

§ Supervision data including notes of meetings and calendar invitations

§ Employee appraisal data

§ Action plan tasks relating to employees and service users

§ Meeting decisions and discussion notes

§ Risk assessment records

§ Audit responses and evidence notes; and

§ Exit interview records.

· **Technical Data:** including the 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 used to access the Complivolve Platform.

· **Transaction Data:** includes details about purchases and orders made, payments to and from us and billing.

· **Authorised User Data:** in relation to your employees / customers / contractors or other third parties who you grant access to our services ("**Authorised Users**") including username and password, email address

· **Usage Data:** including information about how you and the employees who you grant access to the Complivolve Platform ("**Users**") use the Complivolve Platform.

· **Marketing and Communications Data:** including your preferences in receiving marketing from us.

You will be the data controller in relation to the Customer and Service User Data. We will process the Customer and Service User Data only in accordance with your written instructions and you will be responsible for determining whether to provide us with the data, as well as establishing an appropriate legal basis for our processing of the Customer Content as required under data protection law.

It is important that the personal data we hold is accurate and current. Please keep us informed if your personal data changes during our relationship with you.

5. How is Your Personal Data Collected?

Your interactions with us. You may give us your personal data by corresponding with us by email or by interacting with the Complivolve Platform and uploading data to the Complivolve Platform

Automated technologies or interactions. As you interact with the Platform, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy www.complivolve.com/legals for further details.

Third parties or publicly available sources. We will receive personal data about you from various third parties as set out below:

- **Technical Data** is collected from analytics providers such as Vercel.
- **Contact, Financial and Transaction Data** is collected from providers of technical, payment and delivery services such as Stripe based inside the UK.
- **Identity and Contact Data** is collected from publicly available sources such as the CQC public API Key and Ideal Postcodes API based inside the UK.

6. How Do We Use Your Information

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- To fulfil and perform any contracts we have with you in order to provide our services (including the Complivolve Platform);
- Where it is necessary for our legitimate interests (or those of a third party) and your interest and fundamental rights do not override those interests; and
- Where we need to comply with a legal obligation.

The glossary below sets out more detail about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for Which we will use your personal data

We have set out below, in table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so both where such processing occurs across the portfolio of services we offer and for specific services we offer. We have also identified what our legitimate interest are where appropriate.

We may process your personal data for more than one lawful ground depending on the specific purposes for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below:

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer	Admin	Performance of a contract with you
<p>To process your order including:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p> <p>(c) Agree the terms of a contract with you</p>	<p>(a) Admin</p> <p>(b) Transaction</p> <p>(c) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to provide our services to you and recover debts due to us)</p>
To provide support services for the Complivolve Platform	<p>(a) Admin</p> <p>(b) Customer and Service User Data</p> <p>(c) Authorised User</p> <p>(d) Transaction</p>	Performance of a contract with you
To provide you with access to and usage of the Platform	<p>(a) Admin</p> <p>(b) Customer and Service User Data</p> <p>(c) Authorised User</p> <p>(d) Usage</p> <p>(e) Technical</p>	Performance of a contract with you
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our SaaS Terms or Privacy Policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Admin</p> <p>(b) Authorised User</p> <p>(c) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
To enable you to provide feedback on the Complivolve Platform	<p>(a) Admin</p> <p>(b) Customer and Service User Data</p> <p>(c) Authorised User</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>

<p>To administer and protect the Complivolve Platform (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Admin (b) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant content to you and measure or understand the effectiveness of the content we serve to you</p>	<p>(a) Admin (b) Authorised User (c) Usage (d) Marketing and Communications (e) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To share information with our business partners (in particular, sub-contractors) for the purposes of providing our services to you</p>	<p>(a) Admin (b) Authorised User (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of services to you and to sub-contract services to our business partners) (b) Necessary to comply with a legal obligation (c) Performance of a contract with you</p>
<p>To use data analytics to improve the Complivolve Platform, our marketing, and our customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers, to keep the Complivolve Platform and our website updated and relevant, to develop our business, and to inform our marketing strategy)</p>

Direct Marketing and Opting Out of Marketing

If you have requested information from us or been granted access to the Complivolve Platform we may send you optional marketing messages about the Complivolve Platform.

You can ask us to stop sending you marketing communications at any time by following the opt-out links within any marketing communications sent to you or by contacting us in accordance with section 2.

Cookies and External Links

Complivolve uses essential and analytical cookies. A separate Cookie Policy provides details on the types of cookies used.

The website and the Complivolve Platform may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website or the Complivolve Platform, we encourage you to read the privacy policy of every website you visit.

7. Disclosures of Your Personal Data

Complivolve does not sell personal data. We only share data where strictly necessary and under contract.

Subprocessors (Service Providers)

Complivolve uses the following subprocessors:

- Supabase — UK-based hosting, authentication, database, and file storage services.
- Vercel — UK-based application hosting for the Backend-for-Frontend (BFF).
- Stripe – UK-based payment services.
- Resend Inc. — US-based transactional email delivery service. Direct integration used to send platform notification emails including task assignments, document verification status updates, and account invitations.
- Google Workspace – US-based cloud-based productivity and collaboration suite.

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 your personal data for specified purposes and in accordance with our instructions.

8. International Transfers

We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside the UK to countries which have laws that do not provide the same level of data protection as the UK law.

Whenever we transfer your personal data out of the UK to service providers, we ensure a similar degree of protection is afforded to it by ensuring that we use specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK, namely the International Data Transfer Agreement.

9. How We Protect Your Personal Data

Complivolve applies appropriate technical and organisational measures to protect personal data against loss, unauthorised access, disclosure, alteration, or destruction.

These include, but are not limited to:

- Encryption of data at rest and in transit (TLS/HTTPS);
- Strict role-based access controls;
- User authentication and multi-factor authentication;
- Logical segregation of each client's data using a multi-tenant architecture; and
- Secure hosting within UK-based infrastructure.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

10. Data Retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Unless otherwise requested by the Customer Content is deleted within 30 days of the termination of a contract under which the Customer Content is uploaded onto the Complivolve Platform.

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

In some circumstances you can ask us to delete your data: see section 12 below for further information.

In some circumstances we will 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.

11. Your Rights Under UK GDPR

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful but you do not want us to erase it;
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please email info@complivolve.com.

You have the right of access, rectification, erasure, to object to processing, and to lodge a complaint with the ICO – the details relating to complaints made to the ICO are set out in section 13 below.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

12. Changes to This Privacy Policy

We may update this Privacy Policy periodically to reflect operational, legal, or regulatory changes. If the changes materially affect how we process your personal data, we will notify you by email or through the Complivolve Platform.

13. Complaints

You have the right to make a complaint to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). However, before doing so please make sure you have first made your complaint to us or asked us for clarification if there is something you do not understand. The ICO will expect you to have done this before reviewing your complaint.



Complivolve Ltd

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