PRIVACY POLICY

[PRODUCT NAME] Till / Point of Sale Software

[COMPANY LEGAL NAME], [REGISTERED OFFICE ADDRESS]

Last updated: [DATE]

This Privacy Policy explains how [COMPANY LEGAL NAME] ("we", "us") collects and uses personal data in connection with the [PRODUCT NAME] software and our website. We are the data controller for the purposes described in Section 2, and a data processor for the purposes described in Section 3.

1. Who We Are

[COMPANY LEGAL NAME] is a company registered in England and Wales, company number [COMPANY NUMBER], registered office [REGISTERED OFFICE ADDRESS]. Contact us regarding privacy at [CONTACT EMAIL]. [If applicable: Our ICO registration number is [ICO NUMBER].]

2. Data We Collect and Control Directly

This covers data about our direct customers (the businesses that buy or subscribe to the Software) and their authorised staff who contact us, not the Customer's own end-customers (see Section 3).

2.1 What we collect

- Account and contact details: name, business name, email, phone number, billing address.
- Payment and billing information: processed via our payment provider [PAYMENT PROVIDER NAME]; we do not store full card numbers ourselves.
- Licence and subscription records: which product version, Sites, and support tier apply to your account.
- Support communications: emails, tickets, or call notes when you contact us for help.
- Technical/usage data: application version, error logs, and crash diagnostics sent by the Software to help us fix bugs, where enabled.
- Website usage data: pages visited and, where used, cookies (see our separate Cookie Policy if applicable).

2.2 Why we use it and our lawful basis

- To perform our contract with you: setting up accounts, licensing, billing, and providing support (Article 6(1)(b) UK GDPR).
- To comply with legal obligations, e.g. accounting and tax records (Article 6(1)(c)).
- For our legitimate interests in improving the Software, preventing fraud, and direct marketing to existing business customers about similar products, where you can opt out at any time (Article 6(1)(f)).

2.3 Retention

We keep account and billing records for as long as your account is active and for [6 years] afterwards to meet accounting and tax obligations. Support tickets are kept for [24 months]. Diagnostic logs are kept for a shorter period, typically [90 days], unless needed to investigate an ongoing issue.

3. Data We Process on Behalf of Our Customers

When a business uses the Software as their till system, the Software may process personal data about that business's own customers and staff (for example, names on orders, loyalty or contact details entered at the till, or staff login/clock-in records). In relation to this data, our customer (the business) is the data controller and we act only as a data processor, on the terms of our Data Processing Agreement, which forms part of our Terms and Conditions.

If you are a customer of one of our business users (for example, you made a purchase at a shop or restaurant using the Software), and you have a question about how your data is used, please contact that business directly, as they are the controller responsible for your data. We process it only on their documented instructions.

4. Card Payment Data

The Software is designed to interoperate with third-party card payment terminals. We do not receive, process, or store cardholder card numbers, expiry dates, or CVV codes. Card payment data is handled entirely between the till operator, the card terminal, and the relevant payment service provider under their own privacy and PCI-DSS terms.

5. Sharing Your Data

We share personal data with:

- Sub-processors who help us provide the Service, such as cloud hosting providers [e.g. AWS/Azure/etc.], payment processors, and email/support tools — a current list is available on request;
- Professional advisers (accountants, auditors, solicitors) where necessary;
- Regulators, courts, or law enforcement where required by law;
- A buyer or successor in the event of a sale or restructuring of our business.

We do not sell personal data to third parties for their own marketing purposes.

6. International Transfers

Where any sub-processor is located outside the UK, we ensure an appropriate safeguard is in place, such as the UK International Data Transfer Addendum to the EU Standard Contractual Clauses, or a UK adequacy regulation, before transferring personal data.

7. Your Rights

Subject to applicable exemptions, you have the right to: request access to your personal data; request correction or deletion; object to or restrict certain processing; request data portability; and withdraw consent where processing is based on consent. To exercise these rights, contact [CONTACT EMAIL]. You also have the right to complain to the UK Information Commissioner's Office (ico.org.uk) if you believe we have not handled your data properly.

If your data is processed by us only as a processor on behalf of a business customer (Section 3), please direct data subject rights requests to that business in the first instance, and we will assist them in responding as required by our Data Processing Agreement.

8. Security

We use appropriate technical and organisational measures to protect personal data, including encryption in transit, access controls, and regular security review of our own infrastructure. No system is completely secure, and we cannot guarantee absolute security.

9. Children

The Software and our website are intended for business use and are not directed at children. We do not knowingly collect personal data from children.

10. Changes to this Policy

We may update this Privacy Policy from time to time. Material changes will be notified to active customers by email or in-app notice. The "Last updated" date above shows when this policy was last revised.

11. Contact Us

Questions about this Privacy Policy or how we handle personal data can be sent to [CONTACT EMAIL] or by post to [REGISTERED OFFICE ADDRESS].

This is a template prepared for planning purposes and does not constitute legal advice. Confirm actual sub-processors, retention periods, and ICO registration status before publishing, and have it reviewed by a solicitor or data protection professional.