

Policy Document

Privacy Policy

Website Version (September 2026 onwards)



This Privacy Policy

Your privacy is important to us. It is Spiral Communications' policy to respect your privacy regarding any information we may collect from you across our website, <http://spiralcom.co.uk>.

- We only ask for personal information when we truly need it to provide a service to you.
- We collect data by fair and lawful means, ensuring we have an appropriate legal basis for all processing activities. We also let you know why we're collecting it and how it will be used.
- We only retain collected information for as long as necessary to provide you with your requested service. What data we store, we'll protect within commercially acceptable means to prevent loss and theft, as well as unauthorised access, disclosure, copying, use or modification.
- We don't share any personally identifying information publicly or with third-parties, except when required to by law or as described in "Data Collection" below.

Our website may link to external sites that are not operated by us. Please be aware that we have no control over the content and practices of these sites, and cannot accept responsibility or liability for their respective privacy policies.

You are free to refuse our request for your personal information, with the understanding that we may be unable to provide you with some of your desired services.

Data Collection & Legal Bases

Information You Provide Directly

When you interact with our website by submitting an inquiry, contacting our team, or requesting a service, we collect personal details necessary to assist you. This information typically includes your name, business name, email address, phone number, and the specific message or detail of your inquiry. We collect this data exclusively to evaluate your request, communicate with you directly, deliver requested services, and manage ongoing customer relationships effectively.

Our legal basis for processing this information depends on the nature of your request. Where you inquire about or request a service, we process your data under **Contractual Necessity** (Article 6(1)(b) UK GDPR) to take the necessary steps before entering into a formal contract or to fulfill an existing agreement. For general business inquiries, we rely on our **Legitimate Interests** (Article 6(1)(f) UK GDPR) to efficiently respond to incoming communications, maintain records of business correspondence, and manage our client relationships.

Google Analytics & Google Search Console (Google)

We collect technical information about how visitors interact with our website through Google Analytics, including your IP address (anonymized prior to storage), browser type, device information, operating system, pages visited, and referring URLs. We use this information to analyze site traffic, optimize user experience, and monitor website performance. The legal

basis for processing Google Analytics data is your **explicit consent** (pursuant to Article 6(1)(a) UK GDPR), which is gathered via our cookie banner before any non-essential cookies are set; you may withdraw this consent at any time through our cookie settings. Additionally, we use Google Search Console to monitor our site's search performance and diagnose technical indexing issues. Search Console processes aggregate search query data and technical site logs; our legal basis for this processing is our **legitimate interests** (Article 6(1)(f) UK GDPR) in maintaining a secure, functional, and easily searchable website. Data processed by these services may be transferred to Google LLC servers in the United States, safeguarded by standard contractual clauses and recognized adequacy frameworks.

Website Hosting & Infrastructure (Amazon Web Services)

Our website and underlying databases are hosted on Amazon Web Services (AWS), provided by Amazon Web Services UK Limited (and/or Amazon Web Services EMEA SARL). When you interact with our website, AWS processes technical diagnostic information and server log files on our behalf, including your IP address, timestamp, device details, and resource requests.

This data is processed to ensure system stability, deliver site content securely, defend against cyber threats (e.g., DDoS attacks), and maintain server performance. The legal basis for this processing is our **legitimate interests** (Article 6(1)(f) UK GDPR) in delivering a reliable, secure, and performant online service.

AWS acts purely as a **data processor** under our instructions via a formal Data Processing Addendum (DPA). Our site data is hosted in AWS UK data centers (London Region, eu-west-2) to keep your personal information within the UK jurisdiction. If any routing or backup maintenance involves technical support mechanisms outside the UK/EEA, international transfers are protected using UK-approved Standard Contractual Clauses (SCCs) and the UK International Data Transfer Addendum.

Website Hosting & Infrastructure (Figma Sites)

Our website and underlying digital assets are hosted on and delivered through Figma Sites, provided by Figma, Inc. When you interact with our website, Figma processes technical diagnostic information and standard server access logs on our behalf, including your IP address, timestamp, device details, and resource requests.

This data is processed to deliver site content reliably and securely, ensure platform stability, defend against cyber threats (e.g., malicious traffic and DDoS attacks), and maintain server performance. The legal basis for this processing is our **legitimate interests** (Article 6(1)(f) UK GDPR) in maintaining a reliable, secure, and performant online presence.

Figma acts as a **data processor** operating under our instructions via Figma's Data Processing Addendum (DPA). As part of our Figma Enterprise configuration, our primary site data and content are hosted in secure EU data centers under Figma's EU Data Residency framework.

Where secondary technical support, edge delivery, or diagnostic metadata involve transfers outside the UK or EEA, such transfers are safeguarded using appropriate transfer mechanisms, including the UK Extension to the EU-U.S. Data Privacy Framework (DPF), UK-approved Standard Contractual Clauses (SCCs), and the UK International Data Transfer Addendum.

How Long We Retain Your Data

We store your personal data only for as long as necessary to satisfy the specific purposes for which it was originally collected. Customer records, contract information, and general business inquiries are retained for the duration of our business relationship, plus an additional six years following contract completion to meet UK statutory accounting, legal, and tax obligations. Technical data follows shorter, dedicated schedules: web analytics data is retained for up to 14 months before being automatically deleted or anonymized, while raw server logs are kept for 30 to 90 days to perform routine security audits and system troubleshooting.

Once personal data reaches the end of its applicable retention period, it is securely deleted, overwritten, or fully anonymized so that it can no longer identify you. Throughout the retention lifecycle, all stored information is safeguarded using robust technical and organizational security measures to prevent loss, theft, unauthorized access, disclosure, or modification.

Your Data Protection Rights

Under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, you have specific rights regarding the personal information we hold about you:

- **Right of Access:** You have the right to request copies of the personal data we hold about you (commonly known as a Subject Access Request).
- **Right to Rectification:** You have the right to request that we correct any information you believe is inaccurate or complete information you believe is incomplete.
- **Right to Erasure ("Right to be Forgotten"):** You have the right to request that we erase your personal data, subject to certain legal conditions (for example, where the data is no longer necessary for the purposes for which it was collected).
- **Right to Restrict Processing:** You have the right to request that we restrict the processing of your personal data under certain circumstances, such as if you contest the accuracy of the data.
- **Right to Object to Processing:** You have the right to object to our processing of your personal data where we rely on legitimate interests as our legal basis, or where we process your data for direct marketing purposes.
- **Right to Data Portability:** You have the right to request that we transfer the personal data you provided to us to another organization, or directly to you, in a structured, commonly used, and machine-readable format.
- **Right to Withdraw Consent:** Where we rely on your consent to process your personal data (such as for non-essential cookies or marketing), you have the right to withdraw that consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.

To exercise any of these rights, please contact us at reception@spiralcom.co.uk or by post at **Spiral Communications, Manor House, 1 Manor Street, Sheepscar Leeds, West Yorkshire,**

LS7 1PZ. We will respond to your request without undue delay and at least within one calendar month of receipt. We do not charge a fee for exercising your rights, unless your request is manifestly unfounded or excessive.

Your Right to Complain

If you have any concerns or complaints about how we collect, process, or store your personal data, we encourage you to contact us directly in the first instance so we can investigate and resolve the issue. Under UK data protection laws, you have the right to submit a data protection complaint directly to us via email at reception@spiralcom.co.uk or by writing to us at Spiral Communications, Manor House, 1 Manor Street, Sheepscar Leeds, West Yorkshire, LS7 1PZ. We will acknowledge your complaint within 30 days of receipt, investigate the matter without undue delay, and keep you informed throughout the process.

If you remain dissatisfied with our response, or if you believe our processing of your personal data infringes UK data protection laws, you have the statutory right to lodge a complaint with the UK supervisory authority, the **Information Commissioner's Office (ICO)**. You can contact the ICO through the following channels:

Website: <https://ico.org.uk/make-a-complaint/>

Helpline: 0303 123 1113

Post: Information Commissioner's Office, Wycliffe House,
Water Lane, Wilmslow, Cheshire, SK9 5AF

Data Controller

Spiral Communications Limited

Company number 02789177

Manor House, 1 Manor Street, Sheepscar Leeds, West Yorkshire, LS7 1PZ

Data Protection Contact: Simon Turner, Managing Director

reception@spiralcom.co.uk

Supporting Documentation

[Cookie Policy](#)

Policy Date

This policy is effective as of 4th September 2026.