

S2 Computers Limited – Privacy Policy

Last updated: May 2026

1. Who we are S2 Computers Limited ("S2", "we", "us", "our") is a UK-based IT support and cyber security provider.

- **Company number:** 09515059
- **Registered office:** C/O M&A Partners, 12 Church Street, Cromer, Norfolk, NR27 9ER
- **Operational address:** 15b Ramirez Road, Rackheath, Norwich, NR13 6GD
- **Email:** admin@s2-computers.co.uk
- **Phone:** 01603 670 682

For the purposes of UK data protection law, we act as a **Data Controller** in respect of our own business operations and a **Data Processor** when delivering services to clients.

2. Our commitment to privacy

We are committed to protecting personal data and complying with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Privacy and Electronic Communications Regulations (PECR)

We also maintain **Cyber Essentials Plus** and **Cyber Assurance** certification.

3. Data Protection Officer (DPO)

We have appointed a Data Protection Officer.

- **DPO:** Andrew Atthowe
- **Email:** andy@s2-computers.co.uk

You can contact the DPO for any questions about this Privacy Policy or how we handle personal data.

4. Personal data we collect

Depending on your relationship with us, we may collect and process the following categories of personal data:

- **Identity data:** name, job title, company name
- **Contact data:** email address, telephone number, postal address
- **Business data:** client contracts, service records, support tickets, billing information
- **Technical data:** IP addresses, device identifiers, security and audit logs
- **Website data:** enquiry forms, cookies and analytics data

t: 01603 670682 e: sales@s2-computers.co.uk

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- **Call data:** voice recordings and associated call metadata where telephone calls are recorded
We do not intentionally collect special category data unless it is strictly necessary to deliver contracted services.

5. How we collect personal data

We collect personal data when you:

- Visit our website
- Contact us by phone, email or online form
- Enter into a contract with us
- Receive IT support or managed services
- Attend events, webinars or marketing activities

6. Call recording

S2 Computers uses call recording technology on its telephone systems, which may record both incoming and outgoing calls.

Purpose of recording

Calls are recorded for the following purposes:

- Staff training and development
- Quality assurance and service improvement
- Ensuring consistency in service delivery
- Investigation and resolution of complaints or disputes
- Maintaining the security and integrity of our services

Lawful basis

We process personal data obtained through call recordings under the lawful basis of **legitimate interests**, specifically to maintain and improve service quality, staff performance, and operational effectiveness. We have assessed that these interests are not overridden by the rights and freedoms of individuals.

Notification

Callers will be informed that calls may be recorded, typically via:

- An automated pre-call message; or
- A notification at the start of the call where applicable

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Data retention

Call recordings are retained for **30 days** from the date of recording, after which they are automatically deleted unless required for:

- Ongoing investigations
- Legal or regulatory obligations
- Active dispute resolution

Data access and sharing

Access to call recordings is restricted to authorised personnel within S2 Computers who require access for the purposes outlined above.

Recordings may be shared with:

- Relevant internal teams (e.g. management, compliance)
- Third-party service providers supporting our telephony systems
- Legal or regulatory authorities where required

Data processing role

- Where calls relate to S2's own business operations, S2 acts as a **Data Controller**
- Where calls are made or received as part of services delivered to clients, S2 may act as a **Data Processor**, with recordings handled in accordance with the relevant client contract and Data Processing Agreement

7. How we use personal data

We use personal data to:

- Provide IT support and managed services
- Communicate with clients, prospects and suppliers
- Manage contracts, invoicing and payments
- Maintain system security, monitoring and audit trails
- Improve our services and customer experience
- Meet legal and regulatory obligations

8. Lawful bases for processing

We process personal data under one or more of the following lawful bases:

- **Contract**
- **Legal obligation**
- **Legitimate interests**
- **Consent**

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9. Clients, controllers and processors

When providing services, S2 typically acts as a **Data Processor** on behalf of clients, with processing governed by contracts and DPAs.

10. Data sharing and sub-processors

We may share personal data with trusted third parties where necessary and do not sell personal data.

11. International data transfers

We ensure appropriate safeguards are used where data is transferred outside the UK.

12. Data retention

We retain personal data only as long as necessary, including:

- Client records
- Financial records
- Support and security logs
- Marketing data

13. Your rights

Individuals have rights under UK data protection law, including access, correction, erasure, restriction, objection, and portability.

14. Cookies and website analytics

We use cookies and analytics tools; details are in our Cookie Policy.

15. Information security

We implement appropriate technical and organisational security measures.

16. Complaints

You may lodge complaints with the ICO if you are dissatisfied.

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17. Relationship to contracts

This policy should be read alongside applicable client contracts and DPAs.

18. Changes to this policy

We may update this Privacy Policy from time to time

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