Privacy Policy

1. Introduction

This Privacy Notice explains how Millbank Technologies Limited ("Millbank", "we", "us") collects, uses, stores, and protects personal data. It applies to:

- Visitors to our website
- Users of the compraPRO SaaS platform
- Customers, prospects, suppliers, and business contacts
- Individuals whose data is processed in the course of our consultancy services
- Any personal data we process as a Controller or Processor

We comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This Privacy Notice was last updated on 24th August 2026.

2. Who We Are

Millbank Technologies Limited, Company number 16263038.
Registered in England and Wales.

Millbank is the Data Controller for:

- Customer contact details
- CRM and marketing data
- Billing and financial information
- Website and analytics data
- Consultancy engagement data

Millbank is the Data Processor for:

- Supplier and procurement data stored by customers in the CompraPRO platform
- Any other customer-uploaded data processed solely on their instructions

When acting as a Processor, our obligations are set out in our Data Processing Agreement (DPA).

3. Personal Data We Collect

We may collect and process the following categories of personal data:

3.1 Controller Data

- Name, job title, employer
- Email address, phone number
- Billing and payment information
- CRM records, meeting notes, support communications
- Website analytics and cookie-derived data
- Marketing engagement data (opens, clicks, replies)

3.2 Processor Data (compraPRO)

- Suppliers contact details
- Supplier representatives
- Supplier Data is processed on behalf of the Customer, who is the Controller
- Procurement-related operational data entered by customers
- Audit logs and system activity generated through platform use

3.3 Automatically Collected Data

- IP address
- Browser type
- Device identifiers
- Usage logs
- Authentication logs
- Cookie and tracking data (see Cookie Policy)

4. How We Collect Personal Data

We collect data:

- Directly from you (forms, emails, onboarding, support)
- Automatically via the website or platform
- From publicly available sources (e.g. LinkedIn)
- From customers when they upload Processor Data
- From third-party tools used for analytics, support, or communication

If you provide personal data about someone else, you must ensure you have a lawful basis to do so.

5. Lawful Bases for Processing

We process personal data under the following lawful bases:

Contract

To provide:

- compraPRO platform access
- Support and onboarding
- Consultancy services
- Billing and account management

Legitimate Interests

For:

- CRM and business development
- Security monitoring and fraud prevention
- Improving our products and services
- Analytics and performance monitoring
- Responding to enquiries

Legal Obligation

For:

- HMRC record-keeping
- Compliance with UK law
- Responding to lawful requests

Consent

For:

- Non-essential cookies
- Marketing communications (where required by PECR)

You may withdraw consent at any time.

6. How We Use Personal Data

We use personal data to:

- Operate and improve the compraPRO platform
- Provide consultancy services
- Manage customer relationships
- Deliver support and respond to enquiries
- Send permitted marketing communications
- Maintain security and prevent fraud
- Comply with legal obligations

We do not sell personal data.

7. Sharing Personal Data

We may share personal data with:

- Sub-processors (hosting, email delivery, analytics)
- Professional advisers (lawyers, accountants, auditors)
- Regulatory bodies (e.g. HMRC)
- Third-party service providers supporting our operations

A full list of sub-processors is available in our Sub-processor Register.
We ensure all third parties are bound by appropriate data protection obligations.

8. International Transfers

Some sub-processors (e.g. Microsoft) are located outside the UK.
Where data is transferred internationally, we use:

- UK Addendum to the EU Standard Contractual Clauses
- Adequacy regulations
- Other lawful safeguards

9. Retention Periods

We retain personal data in accordance with our Data Retention Policies, including:

- Controller Data: typically 24 months after last engagement
- Financial records: 6 years (HMRC requirement)
- Processor Data: deleted 30 days after subscription termination
- Backups: retained only for the duration of the backup cycle
- Cookies/analytics: typically up to 26 months

Full details are available in our published retention policies.

10. Security

We implement appropriate technical and organisational measures, including:

- Encryption at rest and in transit
- Access controls
- Audit logging
- Secure development practices
- Regular vulnerability management
- Encrypted backups
- Multi-factor authentication

11. Your Rights

You have the following rights under UK GDPR:

- Access your personal data
- Correct inaccurate data
- Request deletion
- Object to processing
- Restrict processing
- Data portability
- Withdraw consent
- Complain to the ICO

For Processor Data (compraPRO supplier data), requests must be directed to the Customer, who is the Controller.

12. Contact

For privacy enquiries:
Email: privacy@millbanktech.com
Website: https://millbanktech.com