



Probit Ltd.

Privacy Statement

May 14, 2025

Probit Ltd. is registered at 4 Chestnut Court, Parc Menai, Bangor, Gwynedd LL57 4FH, United Kingdom and incorporated in England & Wales under company number 07228092 (the "company").

1. Who we are

This is the privacy statement of Probit Ltd., a company incorporated in England & Wales under company number 07228092 and having its registered office at 4 Chestnut Court, Parc Menai, Bangor, Gwynedd LL57 4FH, United Kingdom.

2. Scope of this statement

This privacy statement explains how Probit Ltd. handles personal data in its capacity as a data controller in the course of operating its own business — including managing our website, marketing activities, and relationships with clients, suppliers, and partners.

It does not apply to personal data processed through any online software services or other customer-facing solutions provided by Probit Ltd., where we act on behalf of a customer. Those processing activities are governed by separate data processing agreements and service-specific privacy notices.

3. Types of personal information we collect

We may collect, use, and store different types of personal information about you when you interact with us in our capacity as a Data Controller (for example, when you visit our website, engage with us as a representative of a client or prospective client, or as a supplier). The personal information we typically collect for these purposes can be grouped as follows:

Identity and contact data

This includes information that allows us to identify and communicate with you directly.

Examples: Your full name, job title, professional role, work email address, work telephone number(s), and work postal address.

Professional and business relationship data

This includes information related to your professional capacity and your organisation's interactions or potential interactions with Probit Ltd.

Examples: The name of the organisation you represent, its industry and size, your role within that organisation, the history of your business interactions with Probit Ltd., and publicly available professional information (such as your LinkedIn profile or details on your company's website) relevant to our B2B engagement.

Transactional and contractual data

This includes information relating to the contracts and transactions between Probit Ltd. and the organisation you represent (or yourself, if applicable, e.g., as a sole trader).

Examples: Details about the services your organisation has enquired about or procured from us, content of contractual agreements (which may contain your name, signature as a representative, and contact details), records of payments made by or to your organisation, and order history.

Financial and billing data

This includes information necessary for processing payments and managing financial aspects of our business relationship, where it relates to an individual.

Examples: Contact details (name, email, phone) for billing personnel within your organisation. If your organisation is a sole proprietorship or partnership, or if personal financial details are provided for transactions, this might include relevant bank account details for processing payments to or from Probit Ltd.

Communications data

This includes records of your correspondence and communications with us in a professional capacity.

Examples: Content of emails, meeting notes, summaries of phone or video calls with Probit Ltd. staff, your feedback on our services, inquiries you make, and support requests or tickets submitted via our contact forms or other communication channels (such as helpdesk tools or chat services, where applicable).

We may also collect associated metadata relating to those communications, such as timestamps, communication method (e.g. phone, email), sender and recipient details, and system logs (e.g. confirmation of receipt or access). This data helps us maintain records of interactions and ensures appropriate service follow-up and accountability.

Website usage and technical data

This includes data generated from your interaction with our corporate website and other online platforms Probit Ltd. controls for its own business purposes.

Examples: Your Internet Protocol (IP) address, browser type and version, device identifiers, operating system details, language preferences, referral source, pages visited on our site, time spent on pages, links clicked, and other information about your interaction with our website, including data collected through cookies and similar technologies (please see our separate Cookie Policy, available at <https://probit.io/cookie-policy>, for more detailed information).

Marketing and event data

This includes information used for marketing Probit Ltd.'s services and managing your engagement with our marketing activities.

Examples: Your marketing preferences (e.g., whether you have opted-in to receive newsletters or other marketing communications), your interaction with our marketing emails (e.g., open rates, clicks), records of your attendance at webinars, seminars, or other events we host or participate in, and your responses to any surveys or promotional offers.

Special categories of personal data

We do not typically collect or process what are termed "special categories of personal data" (such as information about racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health data, or data concerning a person's sex life or sexual orientation) or data relating to criminal convictions and offences for our general business contact and website visitor processing activities.

Should it ever become necessary to process such data for a specific and lawful purpose (e.g., accessibility requirements for an event you attend), we will only do so where permitted by data protection law, with appropriate safeguards, and we will provide specific notice at that time if required.

Please note: The examples above are illustrative. The specific personal information we collect will depend on the nature of your interaction with Probit Ltd.

4. How we use your personal information

In general terms, we collect and use the personal information described in Section [Types of personal information we collect](#) (where Probit Ltd. acts as a Data Controller) for the following main purposes:

- To provide information about our products and services when you enquire;
- To establish and manage our business relationships with current and prospective clients, partners, and suppliers (typically by interacting with individuals representing these organisations);
- To process orders, deliver services, and manage contracts with client organisations;
- To manage financial transactions, including invoicing and payments with client organisations and suppliers;
- To communicate with you for operational purposes (e.g., regarding service delivery to your organisation), for marketing our services (in accordance with your preferences and applicable law), or for other informational purposes related to our business;
- To operate, maintain, secure, and improve our corporate website and other online services Probit Ltd. controls for its own business purposes;

- To comply with our legal and regulatory obligations (e.g., tax and company law);
- To prevent and detect crime, fraud, or corruption;
- To maintain our corporate records and for general business administration.

More specifically, we detail below the main purposes for which we use your personal information (when acting as a Data Controller), the lawful bases under UK GDPR that we rely on for such processing, and, where we rely on legitimate interests, a description of what those legitimate interests are.

- **Purpose:** Responding to your enquiries (e.g., via website contact forms, email, or phone) and providing you with information about our services.
 - **Lawful Basis:** Legitimate interests.
 - **Our Legitimate Interests (where applicable):** To develop our business, respond to potential customer interest, engage with stakeholders, and promote our services.
- **Purpose:** Entering into and managing our contractual relationship and communications with the organisation you represent (e.g., as a client, prospective client, partner, or supplier).
 - **Lawful Basis:** Contractual necessity (for the performance of a contract with your organisation, or to take steps at your organisation's request prior to entering a contract); Legitimate interests.
 - **Our Legitimate Interests (where applicable):** To efficiently manage our contractual obligations and business relationships, and to conduct our business operations effectively.
- **Purpose:** Processing transactions, sending invoices, and managing payments with the organisation you represent.
 - **Lawful Basis:** Contractual necessity (for the performance of a contract with your organisation); Legal obligations (e.g., for financial record keeping, VAT purposes).
 - **Our Legitimate Interests (where applicable):** To ensure timely payment for our services or to our suppliers, and manage our finances in compliance with the law.
- **Purpose:** Sending you marketing communications regarding our services, events, and industry insights (where you have given consent, or where otherwise permitted for B2B marketing under applicable law, e.g., PECR).
 - **Lawful Basis:** Consent; Legitimate interests (for certain types of B2B marketing to corporate contacts where consent is not the primary basis required by PECR).
 - **Our Legitimate Interests (where applicable):** To promote our services, share relevant information, and grow our business.
- **Purpose:** Operating, maintaining, securing, and improving our corporate website and other Probit Ltd.-controlled online platforms (including analysing website usage).

- **Lawful Basis:** Legitimate interests.
- **Our Legitimate Interests (where applicable):** To provide accessible information about our company and services, ensure the security and functionality of our online assets, and understand user engagement to enhance user experience.
- **Purpose:** Complying with our legal and regulatory obligations (e.g., related to tax, company law, or responding to lawful requests from authorities).
 - **Lawful Basis:** Legal obligations.
 - **Our Legitimate Interests (where applicable):** N/A (as the obligation itself is the basis).
- **Purpose:** Managing and ensuring the security of our physical premises (e.g., if CCTV or visitor logs are used when you visit our offices).
 - **Lawful Basis:** Legitimate interests.
 - **Our Legitimate Interests (where applicable):** To ensure the safety and security of our staff, visitors, and property.
- **Purpose:** For internal record keeping, business planning, and general administration.
 - **Lawful Basis:** Legitimate interests.
 - **Our Legitimate Interests (where applicable):** To operate our business efficiently and effectively.

5. Where we collect your personal information from

We collect personal information about you (or individuals at your organisation, where you are acting as their representative) from various sources when we are acting as a Data Controller. These sources primarily include:

- **Directly from you:**
 - When you provide it to us by filling in forms on our corporate website at <https://probit.io>, such as when you submit a contact enquiry, request a product demonstration, subscribe to our newsletters or marketing materials, or download resources.
 - When you correspond with us by post, phone (including records of calls where legally permitted and notified), email, or through other communication channels (e.g., online chat features on our website, if applicable).
 - When you provide us with your business card or contact details at meetings, industry events, conferences, or webinars.
 - When you participate in surveys, provide feedback, or engage in other interactive features of our services (where we are acting as controller for that interaction).

- **Automatically when you use our Probit-controlled online services (e.g., our corporate website):**
 - We automatically collect Technical Data and Website Usage Data (as described in Section [Types of personal information we collect](#)) when you interact with our corporate website. This includes information gathered through server logs.
 - Information is also collected via cookies and similar tracking technologies deployed on our website. For detailed information on the cookies we use and the purposes for which we use them, please see our Cookie Policy, available at <https://probit.io/cookie-policy>.
- **From the organisation you represent:**
 - If you are a representative of a current or prospective client, partner, or supplier organisation, your organisation may provide us with your Identity, Contact, and Professional & Business Relationship Data to enable us to communicate with you, manage our contractual relationship, deliver services to your organisation, or receive services from your organisation.
- **From third parties or publicly available sources:**
 - We may occasionally receive personal data about you from third parties or publicly available sources in a B2B context. Examples include:
 - * Business development and lead generation services that provide contact information for individuals at organisations that may be interested in our services.
 - * Publicly accessible professional profiles (such as LinkedIn), your organisation’s website, or official company registries like Companies House.
 - * Referrals from your colleagues, our existing business contacts, or partners who believe you or your organisation may be interested in our services.
 - * Organisers of industry events, conferences, or webinars where Probit Ltd. participates (where attendee lists are shared in accordance with applicable data protection laws and your preferences).

6. Who we share your information with

When acting as a Data Controller, we may need to share your personal information with certain categories of third parties to conduct our business, provide our services, and comply with legal obligations. We require all third parties to respect the security of your personal data and to treat it in accordance with applicable data protection laws. Where we engage third parties to process personal data on our behalf (as our data processors), we do so under a written contract that sets out their responsibilities and ensures they only process your data for specified purposes and in accordance with our instructions.

We may share your personal information with the following types of third parties:

- **Service Providers (our Data Processors):**

- Companies that provide essential services to help us operate our business. This may include:
 - * IT and system administration services, including cloud hosting providers for our own business systems (e.g., finance systems, email servers).
 - * Customer Relationship Management (CRM) platform providers.
 - * Marketing automation and email distribution platforms for our marketing communications.
 - * Website analytics providers to help us understand website usage.
 - * Payment processing providers to facilitate transactions with our clients and suppliers.
 - * Data backup and disaster recovery service providers for our own business data.
- **Professional Advisors:**
 - Our appointed lawyers, bankers, auditors, accountants, and insurers who provide consultancy, banking, legal, insurance, and accounting services to Probit Ltd., and who are typically subject to professional duties of confidentiality.
- **Governmental and Regulatory Bodies:**
 - HM Revenue & Customs (HMRC), the Information Commissioner’s Office (ICO), and other UK regulatory authorities or government agencies where we are legally required to report processing activities or disclose personal data.
 - Law enforcement agencies or courts, where required by law or a court order, or where necessary for the prevention or detection of crime.
- **Partners and Event Co-hosts (with your consent where required):**
 - If you register for an event, webinar, or promotion that we are co-hosting with a partner, we may share your registration details with that partner, subject to your consent where applicable or as otherwise made clear at the point of registration.
- **Third Parties in Connection with Business Transactions:**
 - In the event that we sell, transfer, or merge parts of our business or our assets, or if we seek to acquire other businesses or merge with them, we may need to share your personal data with the other parties involved in such a transaction. If a change happens to our business, the new owners may use your personal data in the same way as set out in this privacy statement. We will take steps to ensure the confidentiality of your data during such processes.

We do not sell your personal data to third parties.

7. Marketing

We may use your personal information, such as your Identity Data, Contact Data, Professional and Business Relationship Data, Website Usage and Technical Data, and Marketing and Event Data (as described

in Section 3), to form a view on what Probit Ltd. services, events, or information we think you may want or need, or what may be of interest to you in your professional capacity. This helps us decide which of our offerings and insights may be relevant for you (this is considered marketing).

You may receive marketing communications from us if:

- You (or the organisation you represent) have requested information from us or purchased services from us; or
- You have provided us with your details when you registered for an event, downloaded resources, or otherwise engaged with our content; and
- In each case, you have not opted out of receiving such marketing.

We primarily conduct marketing to individuals in their business capacity. For electronic marketing communications (such as emails), we will comply with applicable laws, including the Privacy and Electronic Communications Regulations (PECR). This means:

- We will obtain your explicit opt-in consent before sending you certain types of electronic marketing, where required by law.
- For some B2B marketing to corporate email addresses, we may rely on our legitimate interests to promote our services, provided you have not opted out.

Third-Party Marketing:

- We do not currently share your personal data with any third party for their own independent marketing purposes. Should this practice change in the future, we would only do so with your explicit opt-in consent.
- We affirm that we do not sell your personal data to third parties.

Opting Out of Marketing:

- You can ask us to stop sending you marketing messages at any time by:
 - Following the "unsubscribe" or "opt-out" links on any marketing message sent to you; or
 - Contacting us directly using the details provided in the [Contact information and further advice](#) section.
- If you opt out of receiving marketing communications, this will not affect our processing of personal data provided to us for other non-marketing purposes, such as in connection with the provision of services to your organisation or for other essential business communications.

8. If you choose not to give your personal information

Where we need to collect your personal data by law, or under the terms of a contract we have with the organisation you represent (or are seeking to enter into with your organisation), and you (or your organisation on your behalf) fail to provide that data when requested, we may not be able to perform the contract or provide the services requested.

For example, if essential contact information for a key representative of your organisation is not provided, we may be unable to finalise or manage a service agreement with your organisation. Similarly, if you request information or marketing materials from us and do not provide a means for us to contact you (such as an email address), we will be unable to fulfil that request.

In situations where providing personal data is optional (for example, for certain marketing communications where consent is the lawful basis), we will make this clear at the point of collection, and there will be no direct adverse consequences for our primary services to your organisation if you choose not to provide such optional data. However, you may not be able to receive the specific optional service or communication for which that data was requested.

If we are unable to perform a contract or provide a service due to a lack of necessary personal information, we will notify you or your organisation as appropriate.

9. How long we keep your personal information

We will only retain your personal data (which we process as a Data Controller) 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 or the organisation you represent.

To determine the appropriate retention period for personal data, we consider the following factors:

- 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;
- The applicable legal, regulatory, tax, accounting, or other requirements that mandate data retention for specific periods (for example, financial records are typically kept for at least six years after the end of the relevant financial year).

In some circumstances, you can ask us to delete your data: see the [Your rights](#) section for further information.

In some circumstances, we may 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.

Our specific retention periods for different categories of personal data are documented in our internal data retention schedule. If you require more detailed information about our retention periods for specific aspects of your personal data, please contact us using the details provided in the [Contact information and further advice](#) section.

10. Where we hold your personal information outside the UK

The personal data we collect from you when acting as a Data Controller is primarily stored and processed on secure servers located within the United Kingdom (UK) and the European Economic Area (EEA).

We strive to keep your personal data within the UK and EEA. However, some of our third-party service providers (as detailed in Section [Who we share your information with](#)) may be based outside the UK/EEA, or may use data centres located outside these areas. If we do transfer or allow access to your personal data from a location outside the UK/EEA, we will ensure that appropriate legal safeguards are in place to protect your data to a standard equivalent to that required by UK data protection law.

These safeguards may include one or more of the following:

- Transferring your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK government (under UK Adequacy Regulations).
- Putting in place appropriate contractual safeguards with the recipient, such as the UK's International Data Transfer Agreement (IDTA) or the UK Addendum to the European Commission's Standard Contractual Clauses (SCCs), which require the recipient to protect your data to the standards expected under UK GDPR.
- For transfers to organisations in the United States, we may rely on their certification under the UK Extension to the EU-US Data Privacy Framework, where applicable, or other appropriate safeguards.
- Relying on other lawful transfer mechanisms or derogations as permitted under UK data protection law.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy statement and applicable data protection laws when it is transferred and processed outside the UK/EEA.

If you would like further information about the specific safeguards used when transferring your personal data outside the UK/EEA, please contact us using the details provided in section [Contact information and further advice](#).

11. Using our website

This section outlines how we collect and use personal data when you visit and interact with our corporate website(s) (e.g., <https://probit.io>) controlled by Probit Ltd. for its own business purposes.

- **Information We Collect Automatically:**

- When you visit our website, we automatically collect certain Technical Data and Website Usage Data as described in Section [Types of personal information we collect](#). This can include your IP address, browser type, operating system, referral source, pages viewed, the duration of your visit, and your navigation paths through our website.
- This information is collected through our server logs and through the use of cookies and similar tracking technologies.

- **Cookies and Similar Technologies:**

- We use cookies and similar technologies (such as web beacons and pixels) on our website to enhance your Browse experience, analyse site traffic, understand user preferences, and for marketing purposes.
- Cookies are small text files placed on your device when you visit a website. You can control and manage cookies through your browser settings.
- For detailed information on the types of cookies we use, the purposes for which we use them, and how you can manage your cookie preferences, please see our separate Cookie Policy, available at <https://probit.io/cookie-policy>.

- **Information You Provide Voluntarily:**

- We collect personal data that you voluntarily provide to us when you use interactive features on our website, such as:
 - * Filling out contact forms or request forms (e.g., to request a demo, download a whitepaper, or ask a question). This typically includes your Identity Data and Contact Data (e.g., name, email address, phone number, company name) and the content of your query.
 - * Subscribing to our newsletters, blogs, or other marketing communications.

- **How We Use Information Collected Via Our Website:**

- To operate, maintain, and improve our website, ensuring it is secure and content is presented effectively.
- To analyse website traffic and user behaviour to understand how our website is used, which helps us to improve its design, functionality, and content.
- To respond to your enquiries, provide you with information you have requested, and fulfil your requests (e.g., scheduling a demo, sending you a newsletter).
- For marketing purposes, in accordance with your preferences and applicable law (as detailed in Section [Marketing](#)).

- To diagnose technical problems or manage security-related issues.

- **Third-Party Websites:**

- Our website may contain links to other websites operated by third parties. This privacy statement only applies to Probit Ltd. 's own corporate website(s). If you click on a link to a third-party website, you should read their own privacy policy or statement to understand how they collect and use your personal information. We are not responsible for the privacy practices of third-party websites.

12. Your rights

Access to your information — You have the right to request a copy of the personal information about you that we hold.

Correcting your information — We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

Deletion of your information — You have the right to ask us to delete personal information about you where:

- You consider that we no longer require the information for the purposes for which it was obtained
- We are using that information with your consent and you have withdrawn your consent — see *Withdrawing consent to using your information* below
- You have validly objected to our use of your personal information — see *Objecting to how we may use your information* below
- Our use of your personal information is contrary to law or our other legal obligations.

Objecting to how we may use your information — You have the right at any time to require us to stop using your personal information for direct marketing purposes. In addition, where we use your personal information to perform tasks carried out in the public interest or pursuant to the legitimate interests of us or a third party then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

Restricting how we may use your information — In some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where this is no longer a basis for using your personal information but you don't want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

Portability — If we process personal information that you provide to us on the basis of consent or because it is necessary for the performance of a contract to which you are party, and in either case that processing is carried out by automated means, then you have the right to have that personal information transmitted to you in a machine readable format. Where technically feasible, you also have the right to have that personal information transmitted directly to another controller.

Automated processing — If we use your personal information on an automated basis to make decisions which significantly affect you, you have the right to ask that the decision be reviewed by an individual to whom you may make representations and contest the decision. This right only applies where we use your information with your consent or as part of a contractual relationship with you.

Withdrawing consent to using your information — Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given.

Please contact us in any of the ways set out in the [Contact information and further advice](#) section if you wish to exercise any of these rights.

13. Changes to our privacy statement

We keep this privacy statement under regular review and will place any updates on this website.

This privacy statement is effective from the date shown on the cover page and may be updated periodically.

14. Contact information and further advice

If you have any questions about this Privacy Statement, how we handle your personal data when acting as a Data Controller, or if you wish to exercise any of your data protection rights, please contact us.

You can reach us via:

- **Email:** privacy@probit.io

- **Post:**

[Attn: Data Protection Lead / Legal Department]

Probit Ltd.

4 Chestnut Court

Parc Menai

Bangor

Gwynedd LL57 4FH

United Kingdom

If you require further advice regarding your data protection rights, you can consult the Information

Commissioner's Office (ICO), which is the UK's independent body set up to uphold information rights. Their contact details are provided in the [Complaints](#) section.

15. Complaints

We seek to resolve directly all complaints about how we handle personal information but you also have the right to lodge a complaint with the Information Commissioner's Office (ICO):

- Online: <https://ico.org.uk/global/contact-us/email/>
- By phone: 0303 123 1113
- By post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

16. Probit Ltd. as Data Processor

This Privacy Statement primarily describes how Probit Ltd. processes personal data for its own purposes, as a Data Controller for its own business purposes.

In providing certain services to our Customers, Probit Ltd. acts as a Data Processor. This means we process personal data (including data of individuals authorised by our Customers to use these services and any data inputted into these services by such users) on behalf of and under the instruction of that Customer, who is the Data Controller for that data.

Our activities as a Data Processor are governed by a Data Processing Addendum (DPA) or equivalent data processing terms established with each Customer. The Customer is responsible for the lawful basis of processing personal data within the services they subscribe to.

If you are an authorised user of one of our services where we act as a Data Processor, and you have questions about how your personal data is used within that service, or if you wish to exercise your data subject rights in relation to that data, you should direct your inquiries to your employer or the organisation that has provided you with access to the service (the Data Controller).

For detailed information on how we process data as a Data Processor for a specific service, please refer to the dedicated privacy notice for that service.