



At Bluesource, we are committed to protecting and respecting your privacy.

Your privacy is important to us and this Privacy Policy (“Policy”) explains what personal data we collect, why we collect it, how it is used, the circumstances in which it may be shared, and the measures we take to keep it secure.

This Privacy Policy applies to the processing of personal data relating to customers, prospective customers, business contacts, suppliers, and other individuals whose personal data Bluesource processes in connection with our services and business activities. It does not cover the personal data of employees, workers, or job applicants, which is subject to separate internal notices.

We may update this Policy from time to time. The current version is available at <https://bluesource.co.uk/privacy-and-governance>. By using our website or services, you acknowledge that you have read and understood this Policy.

If you have any questions, please contact privacy@bluesource.co.uk, write to Operations team at Bluesource Information Limited, London, SE1 2TU, or telephone 020 7940 6200.

Who are we?

Bluesource Information Limited is a private limited company registered in England under, number 4064193, with our registered office at: 122 Tooley Street, London, SE1 2TU. The Company comprises Bluesource Information Limited and its trading subsidiaries.

How do we collect information from you?

Information you give us

We obtain information about you when you visit our website, register with Bluesource, subscribe to one of our news feeds (via the website or follow us from LinkedIn or Twitter, etc.), enter promotions or for example when you contact us about products and services. We may also be passed your information from certain Bluesource partners in relation to our products and services, where the relevant data controller has obtained the necessary consents or has another lawful basis to share that information.

If you subscribe to one of our services or purchase goods from us (collectively “Services”), you will be asked to supply PII to enable us to deliver the Services, meet contractual commitments, or comply with legal obligations such as fraud prevention

We may combine information about you with information obtained from other Services we provide to you or your organisation

Information we get from the use of our services

PII may also be contained within documentation or correspondence received during the provision of Services, such as project documentation, proposals, contracts, or other documents exchanged between your organisation and Bluesource.

When you use our services, we may automatically collect and store certain information in system or application logs, including:

- details of access dates and times;
- telephony log information (where applicable);

- IP addresses used to access Services; and
- cookies that identify browser preferences (see Cookie Policy available at <https://bluesource.co.uk/privacy-and-governance>).

Our servers and Microsoft Azure instances are located within the United Kingdom. Where possible, we use UK- and EU-based facilities

What type of information do we collect from you?

The PII we collect is appropriate, specific, and minimised for the purposes required. We do not request special category data (such as race, religion, health, sexual orientation, or similar), unless strictly necessary to provide a specific service or to comply with legal obligations.

Typically collected PII may include:

Name	to verify identity and identify you as an individual
Company name	to relate you to a specific company
Work contact details	work address, work email, work telephone number, work mobile number are processed in day to day in communications to and from you and may be used, together with your name in documentation produced during the relationship between us and you.
Job title/role	used to specify the role within the company that you perform and to apply relevant responsibilities and controls, as well as to communicate to the most appropriate person
Department responsibilities,	used to specify the department you work in and to apply relevant benefits and controls, as well as to communicate to Individuals at a departmental level
Login Names	used to authenticate and track access to services for information security purposes, including access control, and provide individual accountability to such access.
IP Address	the IP address of a device used to access or approve services, such as signing documents on behalf of the company, may be logged for information security and compliance purposes
Cookies	Cookies may track access to certain Company websites. Please refer to the Company's Cookie Policy for more details
Signature	for the approval of transactions between the Parties.

How we use the information about you?

We process PII for the following purposes:

- supplying and managing Services;
- acting as a Data Processor on behalf of customer Data Controllers;
- identifying individuals requesting Services or access;
- improving security and preventing fraud;
- enforcing contractual terms and policies;
- communicating service-related information;

- providing information where consent has been given;
- service improvement and analytics;
- customising your experience; and
- gathering feedback.

Lawful basis for processing

Personal data is processed only where a lawful basis applies, including:

- contractual necessity;
- compliance with legal obligations;
- legitimate interests, where not overridden by individual rights; or
- consent, where explicitly obtained.

Where Bluesource acts as a Data Processor, processing takes place strictly in accordance with the instructions of the relevant Data Controller.

Automated decision-making

Bluesource does not carry out automated decision-making or profiling that produces legal or similarly significant effects for individuals.

Data retention

Personal data is retained only for as long as necessary to fulfil the purposes for which it was collected, including service delivery, regulatory compliance, dispute resolution, and enforcement of agreements.

Retention periods are defined by contractual, legal, regulatory, and operational requirements and are documented within Bluesource's internal Data Retention Policy. Data is securely deleted, anonymised or returned when no longer required, although some limited data may need to be indefinitely retained for compliance, legal and integrity purposes, such as contractual records, access logs and financial documents.

Transparency

We aim to be clear about what information we collect and why, so that individuals can make informed choices. We do not collect or retain personal data that is unnecessary for the stated purposes.

Accessing and updating your personal information

Bluesource does not currently provide a self-service portal for personal data access. Requests to access, update, or delete personal data should be sent to privacy@bluesource.co.uk. We may require identity verification before acting on a request.

Requests may be declined where they are manifestly unfounded, excessive, technically impractical, or where legal retention obligations apply.

Your rights under data protection law

Under the UK GDPR and Data Protection Act 2018, you have the right to:

- access your personal data;
- request rectification of inaccurate data;
- request erasure of personal data;
- restrict processing in certain circumstances;
- request data portability;
- object to processing based on legitimate interests or direct marketing; and
- not be subject to qualifying automated decision-making.

Information that we share

Bluesource does not sell or rent PII. Information may be shared where:

- required to deliver contracted Services;
- shared with trusted partners or subcontractors under confidentiality and data protection obligations;
- consent has been provided; or
- required for legal or regulatory reasons.

Access to personal data is limited on a “need-to-know” and least-privilege basis.

International transfers

As a global company, bluesource may process PII on our systems and servers around the world. We may process your personal information on a server located outside the country where you live, however we endeavour to store and host such systems and servers within the United Kingdom and the European Economic Area (“EEA”).

Where personal data is transferred outside the UK or EEA, appropriate safeguards are implemented in accordance with our Data Processing Policy (<https://bluesource.co.uk/privacy-and-governance/data-privacy-and-processing>), including adequacy regulations, transfer risk assessments, transfer impact assessments, UK International Data Transfer Agreements, or approved contractual safeguards, such as the implementation of standard contractual clauses.

Information Security



We protect personal data using appropriate technical and organisational measures designed to safeguard confidentiality, integrity, and availability against unauthorised access, alteration, disclosure, or destruction.

While no system can be guaranteed to be completely secure, bluesource applies security controls proportionate to the risks identified and regularly reviews these measures to ensure they remain effective.

We operate an Information Security Management System (“ISMS”) that is independently certified and maintained in accordance with recognised security standards, including ISO/IEC 27001, Cyber Essentials, and Cyber Essentials Plus.

Compliance and cooperation with regulatory authorities

We regularly review compliance with this Policy, UK GDPR, and the Data Protection Act 2018 as part of our ISMS.

Should I have a complaint, how do I report it?

To make it easy for our customers to raise a complaint, in the unlikely event they need to, we have a single email address that can be used complaints@bluesource.co.uk. We will determine whether the complaint is service, compliance or HR related and engage the necessary individuals to deal with the complaint for you.

If you remain dissatisfied, you have the right to lodge a complaint with the Information Commissioner’s Office (ICO) at www.ico.org.uk.

Changes

We may update this Policy and will notify customers of significant changes via direct notice or website publication.

Questions and Suggestions

If you have questions or suggestions, please complete a feedback form or you can contact us at: privacy@bluesource.co.uk.