

Adaptive Business Management Systems – Privacy Policy

Effective Date: October 14, 2025

Summary

This Privacy Policy explains how Adaptive Business Management Systems Ltd (“we”, “our”, “us”) collects, uses, stores, and protects your personal information when you visit our websites or use our services (including CAPA Manager). It also outlines your rights under the UK Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR).

If you have any questions, contact us at support@adaptivebms.com.

Who We Are

Data Controller: Adaptive Business Management Systems Ltd

Registered in the United Kingdom

Address: [Insert Company Address]

Company Number: [Insert Company Number]

Information We Collect

We may collect the following types of information:

- **Automatically collected:** IP address, browser type, operating system, referring/exit pages, and clickstream data (via cookies and analytics tools).
- **Information you provide voluntarily:** name, email address, organisation, phone number, job role, and other details you submit when registering or using our services.
- **Service content:** documents, files, and attachments uploaded by users.
- **Account data:** information we collect to create, manage, and maintain your CAPA Manager account — such as name, organisation, email address, subscription type (demo, free, or paid), account status, login credentials (securely hashed), billing contact details, and usage metadata (e.g. last login date, role assignments, or permissions).

Our services are not intended for children under 16, and we do not knowingly collect their data.

Legal Basis for Processing

We process personal data on the following grounds:

- Contractual necessity – to provide services you request.
- Consent – for optional details, marketing, and testimonials.
- Legitimate interest – to improve services and ensure security.
- Legal obligation – where required by law.

How We Use Your Data

We use your information to provide services, manage accounts, respond to enquiries, deliver updates, process payments, and improve security. For marketing, we rely on consent or the UK 'soft opt-in' where applicable. You can opt out anytime.

Data Retention

We keep data only as long as needed to fulfil contractual or legal obligations, resolve disputes, and maintain business continuity:

- **Active demo or paid accounts:** data is retained while the account remains active.
- **Demo / free accounts:** deleted after **3 months of inactivity** or at our discretion, but no longer than 12 months.
- **Paid / premium accounts:** if unpaid, the account enters a **locked status** (data remains visible to users but new CAPA records cannot be created).
- **Locked unpaid accounts:** retained for up to **12 months**, then converted to **Demo / free account status** and subject to deletion as above.
- **User account data:** routine account and CAPA data are deleted according to the rules above. However, basic communication records such as support correspondence, account setup confirmations, and administrative emails may be retained for up to **6 years** for audit, contractual, and compliance purposes.
- **Financial / billing data:** retained for up to **6 years** after the end of the financial year in which the transaction occurred, in line with HMRC and legal obligations.
- **Support enquiries:** retained up to **2 years** after resolution.
- **Marketing data:** retained until you withdraw consent.
- **Backup data:** may be retained securely for up to **three (3) years** for disaster recovery and legal compliance purposes. Backup data is stored offline, not actively processed, and automatically deleted after this period.

Once these retention periods expire, data is securely deleted or anonymised

International Transfers

If your data is transferred outside the UK/EU (e.g. for cloud hosting or payment processing), we ensure safeguards such as Standard Contractual Clauses (SCCs).

Your Rights

You have rights under GDPR: access, correction, deletion, restriction, objection, portability, and withdrawal of consent. To exercise these rights, email support@adaptivebms.com. We will respond within 30 days.

If you are not satisfied with our response, you can complain to the UK Information Commissioner's Office (ICO) at ico.org.uk.

Data Ownership and Uploaded Content

CAPA Manager allows users to upload, create, and store information, including documents, attachments, and investigation data (“User Content”).

- **Ownership** – All User Content remains the property and responsibility of the Subscriber (the organisation that owns the account). Adaptive Business Management Systems Ltd acts as a **Data Processor** for this information, processing it solely to provide and support the Services.
- **Access & Control** – Subscribers control who can access, edit, or delete User Content within their organisation’s account. Adaptive BMS does not access or use this data for any purpose other than delivering the contracted service, maintaining system security, or where legally required.
- **Security** – All uploaded data is encrypted in transit and at rest. Backups are maintained in secure UK data centres that comply with ISO 27001 and related standards.
- **Deletion** – User Content is deleted according to the account rules described in the Subscriber Agreement (e.g., demo/locked/deleted account lifecycle).

Cookies & Tracking

We use essential cookies for functionality and optional cookies (e.g., Google Analytics, social sharing) with your consent. See our Cookie Policy for details.

Security

We implement industry-standard measures to protect your data in transit and at rest. No method of transmission or storage is 100% secure, but we continuously improve our security practices.

Policy Updates

We may update this Privacy Policy from time to time. Material changes will be communicated via email or website notice.

Contact Us

Data Protection Officer

Adaptive Business Management Systems Ltd

Email: support@adaptivebms.com

Address: [Insert Company Address]