Think Incorporated – Privacy Notice

Think Incorporated Limited · Company Reg. No. 4923692 · ICO registration ZA421997

1. About this notice

This notice explains how Think Incorporated Limited collects and uses personal data when you visit our website, contact us, or work with us as a client, supplier or business contact. For this data, we are the data controller.

It does not cover personal data we handle on behalf of our clients, such as data collected through websites we build or host for them, or through promotions we run for them. For that data, our client is the controller, and their own privacy notice applies. Promotions are covered by our Promotions Privacy Notice.

2. Who we are

Think Incorporated Limited, iCentrum, Holt Street, Birmingham, West Midlands, B7 4BP. We are a web development, hosting and digital marketing agency.

Our Data Protection Officer is Laura Smalley, who can be contacted at laura@thinkincorporated.com.

3. What we collect

- **Contact details:** your name, job title, company, email address and phone number.
- **Enquiries and communications:** what you tell us when you contact us, and our correspondence with you.
- **Client and supplier records:** details needed to deliver and manage our services, including contracts, invoices and payment records.
- **Website usage: your IP address, browser and device type, and the pages you visit, collected through our hosting and security tools and, where you agree, Google Analytics cookies.**

4. How we use your data and our lawful basis

Purpose	Lawful basis
Responding to your enquiries and preparing quotes	Taking steps at your request before entering a contract, or our legitimate interests in responding to business enquiries
Delivering our services and managing our relationship with clients and suppliers	Performing our contract
Invoicing, accounting and keeping business records	Performing our contract and complying with legal obligations, such as tax law
Keeping our website and systems secure, and	Our legitimate interests

Purpose	Lawful basis
improving our website	
Setting analytics and other non-essential cookies	Your consent
Meeting legal and regulatory requirements	Legal obligation

5. Cookies

Our website uses cookies that are needed for it to work and stay secure. We also use Google Analytics to understand how our website is used. Analytics and other non-essential cookies are only set if you agree to them through our cookie banner, provided by our SiteToolkit platform, and you can change your choice at any time.

6. Who we share your data with

We never sell your personal data. We only share it where needed with:

- Service providers who support our business, such as our hosting and email provider (SiteGround), backup provider (IDrive), website analytics (Google Analytics), cloud storage for administration records (Apple iCloud), and our accounting and banking providers, under contracts that protect your data.
- Professional advisers, such as accountants and legal advisers.
- Authorities, where required by law.

Personal data is never made visible to AI tools.

7. Where your data is stored

Our website, email and main business systems are hosted in the UK, with backups in the UK and the EU. Where a service provider processes data outside the UK, we make sure suitable safeguards are in place, such as UK adequacy regulations or approved contractual clauses.

8. How long we keep your data

Data	Retention
Enquiries that do not lead to work	2 years from last contact
Client and supplier records, contracts and invoices	6 years after the end of the financial year they relate to, as required for tax and accounting
Website security logs	12 days
Website analytics data	Up to 14 months, as set in Google Analytics

9. How we protect your data

We use company-owned, encrypted devices, multi-factor authentication, approved password managers, encryption in transit and at rest, and access limited to staff who need it. Our staff are trained in data protection and security awareness each year.

10. Your rights

You have the right to be informed about, access, correct or erase your personal data, to restrict or object to its use, to data portability, and to withdraw consent where we rely on it.

To make a request, email laura@thinkincorporated.com. We will verify your identity, aim to respond within 14 days, and will always respond within one month, as required by law.

If you are unhappy with how we have handled your data, please contact us first. You also have the right to complain to the Information Commissioner's Office at ico.org.uk.

11. Children

Our website and services are aimed at businesses, and we do not knowingly collect personal data from anyone under 16.

12. Changes to this notice

We may update this notice from time to time. Last updated: 19 October 2026.