



CoreFront LTD – Privacy Policy

PLEASE NOTE

This document is correct as of its print or issue date. If you are reading a downloaded, printed, or archived version, it may have been superseded by a newer revision.

The most up-to-date versions of all CoreFront Ltd policies, terms, and service documentation are published and available at:

corefront.net/policies

For verification of current policy status, or to request a digitally signed copy of the latest version, please contact: [**legal@corefront.net**](mailto:legal@corefront.net)

Last Reviewed: 06/03/2025

This Privacy Policy explains how CoreFront Ltd ("we", "us", or "our") collects, uses, discloses, and protects personal information in relation to the services we provide. This includes information gathered from our website, through our client services, and in connection with the technologies and platforms we use to deliver managed IT, leasing, and security solutions.

1. Who We Are

CoreFront Ltd is a UK-based provider of IT and broadcast engineering services, frontline protection, and technology leasing/support. Our explicit list of (advertised) services (as of print date) is listed below:

- Core Infrastructure (Network Design, Installation & Maintenance)
- IT Asset Leasing
- IT Asset Support and Training
- Broadcast Engineering
- Frontline Protection: Installation and Maintenance
- Frontline Protection: Manned Security

CoreFront Ltd is registered with the Information Commissioner's Office (ICO) as a data controller.

2. Data We Collect

We may collect the following types of data:

- Personal identification data (name, email, phone number)
- Business information (company name, contact details)
- Technical and device data (IP address, device information, usage logs)
- Identity-related data for user account provisioning (first name, last name, user ID)
- Consignment and delivery data (recipient name, address)
- Payment-related data (processed by third parties only)

This data is collected through direct interaction, automated technologies, or third-party services.

3. Third-Party Platforms and Services

We use the following services and platforms in our operations:

- **Microsoft 365 (Internal)** — used by CoreFront Ltd for internal operations and communication; this tenant supports @corefront.net staff email, file storage, and administrative services.
- **Microsoft 365 (External)** — used for client-facing services and leased asset management; this tenant manages users under the @corefrontconnect.com domain and includes Intune/Entra user policies and device provisioning.
- **Action1** — hosted in Europe, used for device monitoring and management.
- **HPE Instant On, Ubiquiti Networks, Hubspot CRM, Spiceworks Portal** — data storage typically occurs in EU or US regions, subject to vendor-specific data residency policies.
- **DrayTek, Dell EMC, Sophos Limited (UK), JetKVM** — device and network data may be processed in the UK or EEA, depending on vendor configuration and deployment.
- **Amazon Web Services (AWS) UK - London Region** — used for cloud infrastructure and data processing strictly within the UK.
- **Eaton Security, Texecom, Ajax Security** — security system data storage varies by deployment and may reside on client-managed infrastructure or within the UK.
- **SumUp** — credit and debit card payments processed using PCI-DSS compliant infrastructure with 256-bit TLS encryption. Data is stored within the EU, and CoreFront Ltd does not store or process card details directly.

We may also provide custom solutions that involve transferring or processing client data with additional third-party vendors, lawfully and under contractual obligation.

4. Use of Microsoft Entra ID and Managed Devices

As part of our IT Asset Leasing and Support services, we manage Windows-based devices using Microsoft Intune (device-based licensing) within a dedicated Microsoft 365 tenant.

Directory Visibility:

User accounts created in our managed Microsoft 365 tenant are used for Windows login and device policy enforcement.

Due to the architectural limitations of Microsoft Entra ID, **some user profile information (such as first and last name)** may be **visible to other users** within the same managed tenant.

We apply technical and organisational measures to minimise unnecessary access; however, **full directory isolation is not guaranteed**.

Client Responsibility:

Clients are responsible for disclosing, prior to onboarding, any individuals whose personal data or identity **must remain concealed** (e.g., protected individuals, confidential staff). CoreFront Ltd shall not be held liable for any incidental exposure resulting from non-disclosure of such information during onboarding.

Security Defaults:

Security Defaults (including Multi-Factor Authentication) **will be applied to all users** as a mandatory security requirement.

5. Data Sharing

We may share personal information:

- With approved suppliers or couriers to fulfil hardware or service orders
- With third-party platforms listed above to deliver core services
- As required by law, legal process, or to enforce our agreements

We ensure all third-party processors comply with relevant data protection laws and contracts.

6. Legal Basis for Processing

We process data under the following legal bases:

- **Contractual obligation** (e.g., provision of support or leasing services)
 - **Legitimate interests** (e.g., service improvement, fraud prevention)
 - **Legal compliance**
 - **Consent** where required (e.g., marketing communications)
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7. Data Transfers

Where data is transferred outside the UK or EEA (e.g., to Microsoft or AWS), we ensure adequate protections are in place (e.g., Standard Contractual Clauses, UK IDTA).

8. Data Retention

We retain personal data only for as long as necessary to fulfil the purposes we collected it for, including legal, accounting, or reporting requirements.

9. Your Rights

You have the right to:

- Access your data

- Request correction or deletion
- Object to or restrict processing
- Lodge a complaint with the ICO (UK)

All Subject Access Requests (SARs) will be handled in a timely manner and in accordance with UK data protection legislation.

10. Access to Personal Data

Access to personal data is strictly limited to account managers and senior staff members with a legitimate interest and operational requirement. Internal user access is logged and reviewed periodically to prevent unauthorised use.

11. Disclaimer and Indemnity

While CoreFront Ltd takes all reasonable steps to ensure compliance with applicable data protection laws and industry best practices, we:

- Do not accept liability for indirect, incidental, or consequential exposure of user identity details within shared tenancy environments, unless explicitly declared and documented in advance.
- Require all clients to formally declare data protection-sensitive individuals prior to system deployment.
- Reserve the right to reject or modify onboarding where declared user privacy requirements cannot be met by the underlying technology platform.

By engaging with our services, clients accept these operational conditions and indemnify CoreFront Ltd against legal or regulatory claims arising from unreported visibility requirements, unauthorised third-party data sharing by clients, or misuse of platform access.

12. Successor Use and Continuity:

In circumstances where responsibility for a site, device, or managed infrastructure is transferred to a third party—such as a new managing agent, property owner, facilities operator, tenant, or other site controller—continued use of CoreFront-managed systems or identities shall constitute binding acceptance of this Privacy Policy and all applicable service agreements. CoreFront Ltd shall not be liable for any failure of the previous party to inform the successor of applicable obligations.

13. Contact Us

For data protection inquiries or to exercise your rights, contact:

Data Protection Officer

CoreFront Ltd
20 Wenlock Road, London, N1 7GU, United Kingdom
Email: dataprotection@corefront.net

This Privacy Policy is reviewed regularly and may be updated to reflect changes in laws, services, or technology.