Composure247

LEGAL

Privacy Notice

How CITSYS LIMITED uses personal data as a controller: visitors, people who sign up, users of Composure247 and customer contacts.

VERSION	DATE	FOR
1.0	24 October 2026	Everyone

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1. Who we are and what this notice covers

1.1 **Who we are.** Composure247 is software provided by **CITSYS LIMITED**, a company registered in England and Wales with company number **07254892**, whose registered office is at **248 Church Lane, Kingsbury, London, NW9 8SL** ("**we**", "**us**").

1.2 **What this notice covers.** It explains how we use personal data when **we decide** how and why it is used. That is, we are the controller. It covers:

- people who visit our website or the Composure247 sign-in and sign-up pages;
- people who sign up for a trial, or contact us about sales, support or anything else;
- the people at our customers who use Composure247 (their account and sign-in details, and how they use the service);
- our customers' billing and contract contacts.

1.3 **What it doesn't cover.** Our customers are managed service providers. They use Composure247 to hold details of their own customers and to send them incident updates. For that data, **our customer is the controller** and we only process it on their instructions, under our **Data Processing Agreement**. If you received an incident update from a service provider through Composure247, that provider's privacy notice applies, and they are the right people to contact about your data.

1.4 **Contact.** Email **legal@composure247.com** about anything in this notice, or write to us at the address above.

2. The personal data we collect

2.1 **When you sign up for a trial:** your first and last name, work email address, company name, country and, if you give it, your company's size. We record which versions of our Terms of Service and Data Processing Agreement you accepted, and when.

2.2 **When you use Composure247:** your name, work email address, mobile number if you add one, your role and permissions, your sign-in details (your password is stored only in scrambled, hashed form), your second sign-in step settings, and single sign-on identifiers if your organisation uses Microsoft Entra ID. We also keep records of what happens in your account, such as sign-ins, changes to settings and messages sent, with the time and IP address.

2.3 **Technical data:** the IP address and browser details sent with every web request. If the app hits an error in your browser, it sends us a short error report so we can fix it.

2.4 **To protect the sign-up page from abuse:** a one-way scrambled (hashed) version of your IP address, so we can limit how many sign-ups come from one place, and the result of the "not a robot" check run by Cloudflare.

2.5 **When you contact us:** what you tell us, and your contact details.

2.6 **Billing:** the name and contact details of the person who handles your account, and billing and payment records. **We don't hold card details.**

2.7 **Where it comes from.** Mostly from you. Some comes from your employer, when an administrator invites you to Composure247 or connects Microsoft Entra ID to add users automatically.

3. Why we use it, and our lawful basis

What we use it for	Lawful basis under UK GDPR
Creating your trial or account, letting you sign in, and providing Composure247	Contract: it is needed to provide the service your organisation signed up for. Where you use it on your employer's behalf, our legitimate interest in providing the service they asked for.
Recording which terms were accepted, and keeping account and billing records	Legal obligation, and our legitimate interest in being able to show what was agreed
Keeping the service secure: second sign-in step, sign-in records, audit records, rate limits, the "not a robot" check	Legitimate interests: protecting our customers, their data and the service
Sending service messages, such as password resets, security alerts, and notice of changes to our terms or sub-processors	Contract and legitimate interests. You can't opt out of these while you have an account, because they are part of running it.
Answering your questions and providing support	Legitimate interests
Fixing faults and improving the service, using error reports and records of how features are used	Legitimate interests
Telling you about new features or offers by email	Legitimate interests, for business contacts as UK law allows. Every such email has an unsubscribe link, and we stop when you ask.
Naming your organisation as a customer	Our Terms of Service, which let your organisation opt out at any time

3.2 **AI.** Composure247 uses AI to draft incident updates from what our customers enter. We don't use AI to make decisions about you that have legal or similarly significant effects, and we don't use your data to train AI models.

4. Who we share it with

4.1 **Our suppliers.** We use these companies to run Composure247 and our website. Each handles personal data only on our instructions, under a contract that protects it:

Supplier	What it does	Where
Supabase	Database, sign-in and server functions	UK (London)
Vercel	Hosts the web application	Global edge network
Resend	Sends emails	EU (Ireland)
Twilio	Sends texts	United States
Anthropic	AI drafting of incident updates	United States
Cloudflare	The "not a robot" check on the sign-up page	Global

Supplier	What it does	Where
Microsoft	Single sign-on and user provisioning, only if your organisation connects Microsoft Entra ID	Your organisation's Microsoft tenant
Formspree	Receives the contact and free trial forms on our website and passes them to us	United States

The current list is at **composure247.com/subprocessors**.

4.2 **Your organisation.** Administrators at your organisation can see the users in their account and the account's activity records.

4.3 **Professional advisers**, such as our accountants and lawyers, where they need it.

4.4 **If the law requires it**, for example to the police or a regulator.

4.5 **If our business is sold**, to the buyer, who must keep using your data in line with this notice.

4.6 **We never sell your personal data.**

5. Where your data is held

5.1 We store your data in the UK (London). Some of our suppliers process it outside the UK:

- email delivery runs in the EU (Ireland), which the UK recognises as giving adequate protection;
- AI drafting, text message delivery and our website's forms run in the United States.

5.2 When data goes to the United States, we rely on the safeguards UK law requires: the UK Extension to the EU–US Data Privacy Framework where the supplier is certified, or otherwise the ICO's International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses. You can ask us for details at **legal@composure247.com**.

6. How long we keep it

Data	How long
Sign-up requests that were never completed	30 days
Records used to limit sign-up abuse (hashed IP addresses)	30 days
Your account details	While your organisation's account is open, then deleted within 90 days of it ending (30 days to export, then deletion), as in our Terms of Service
Records of which terms were accepted	For as long as the agreement lasts, plus 6 years, in case of a legal claim
Billing and accounting records	6 years after the end of the financial year they relate to, as UK tax law requires
Emails and support conversations with us	2 years after the conversation ends, unless they relate to a dispute

Data	How long
Error reports from the app	90 days
Backups	Copies in our daily backups are deleted within 7 days of the original
Data sent to our AI supplier	Deleted by the supplier within 30 days

7. Cookies and similar technologies

7.1 **The Composure247 app** (app.composure247.com) doesn't use advertising or analytics cookies, and doesn't track you across other websites. It stores a small amount of information in your browser that it needs to work:

- your signed-in session, so you stay signed in;
- your display preferences, such as table column widths and which sections are open.

These are strictly necessary, so they don't need your consent. Clearing your browser's site data signs you out and resets them.

7.2 **The sign-up page** runs Cloudflare's "not a robot" check, which reads signals from your browser to tell people from bots. It is used only for that.

7.3 **Our fonts** are served from our own site, so loading a page doesn't contact a third party for them.

7.4 **Our website** (www.composure247.com) uses no analytics or advertising cookies, and loads no scripts, fonts or other content from third parties. It remembers whether you chose light or dark mode, in your browser. If you fill in our contact or free trial form, what you enter is sent to Formspree, which passes it to us (section 4).

7.5 **The Composure247 iPhone app** contains no analytics, crash reporting, advertising or tracking code. It keeps a little data on your phone:

- your sign-in session, in the iOS Keychain, marked device-only, so it isn't backed up to iCloud and can't be read while your phone is locked;
- answers you give when you have no signal, until they can be sent;
- your light or dark mode choice.

All of it is cleared when you sign out. One screen lets you answer by voice: the microphone is on only while you hold the button, and speech is turned into text on the phone itself.

8. Security

We protect your data with:

- encryption in transit and at rest;
- each customer's data kept separate inside the database itself;
- a required second sign-in step for administrators;
- support access to an account that is time-limited and recorded;
- regular security testing.

Our security overview at **composure247.com/security** gives more detail. If you think your account has been compromised, email **security@composure247.com** straight away.

9. Your rights

9.1 Under UK data protection law you have the right to:

- get a copy of the personal data we hold about you;
- have it corrected if it is wrong;
- have it deleted, where we have no good reason to keep it;
- restrict how we use it, or object to our using it on the basis of our legitimate interests;
- object to marketing at any time, which we will always respect;
- receive data you gave us in a format you can take elsewhere, where the law allows.

9.2 **How to ask.** Email **legal@composure247.com**. We will answer within one month, and it is free. We may need to confirm who you are first.

9.3 **If your data came to us through a service provider.** For data held in Composure247 on behalf of one of our customers (section 1.3), contact that customer. If you contact us instead, we will pass your request to them.

9.4 **Complaints.** If you're unhappy with how we've handled your data, please tell us first. You can also complain to the Information Commissioner's Office at **ico.org.uk** or on 0303 123 1113.

10. Changes to this notice

We will update this notice when how we use personal data changes, and change the date below. If a change matters to you, we will tell account administrators by email or in the app. Earlier versions are kept at **composure247.com/legal**.

Version 1.0, 24 October 2026. Composure247 is software provided by CITSYS LIMITED.

Composure247

Every customer kept informed.
Every incident closed properly.

TALK TO US
sales@composure247.com

SIGN IN
app.composure247.com

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