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Cyber Guarded Data Protection Privacy Notice

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Who we are

Cyber Guarded Ltd provides cyber security penetration testing, cyber risk assessments, risk management & auditing services.

We are based in the UK (Belfast, London) and Republic of Ireland (Dublin).

Cyber Guarded is committed to protecting and respecting your privacy and complying with the principles of applicable data protection laws. This notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Collection of personal data

Cyber Guarded may collect and/or create or otherwise obtain and process the following data about you:

- 1. Information about you that you provide by filling in our enquiry form through our websites (itguarded.com, cyberguarded.com);
- 2. We may also ask you for information when you contact us by telephone. If you contact us, we may keep a record of that correspondence.
- 3. Details of when you digitally interact with Cyber Guarded via our websites and other digital channels, and the resources that you access which may include the use of cookies (subject to our Cookie policy).
- 4. Information about emails and other communications we have sent to you and your interaction with them.

<u>Note</u>: In the event that personally identifiable information is gathered during the delivery of our cyber security testing and auditing services, we ensure that a complete data destruction of the test data is carried out using a National Cyber Security Centre (NCSC) approved data destruction product. Furthermore, any personally identifiable information contained within the deliverables of a Cyber security engagement, such as reports for penetration tests or NCSC IT Health Checks, is redacted from Cyber Guarded stored copies post issuing to the customer and/or NCSC under contract.

How do we use your information and what is the basis for our processing of this information

Cyber Guarded will use your personal information to:

- 1. Carry out our obligations arising from any contracts entered into between you and Cyber Guarded;
- 2. Provide you with information or services that you request from Cyber Guarded or which we feel may interest you, but only where we are legally entitled to do so;
- 3. Notify you about changes to our service.

Cyber Guarded will not use any of the personal information we collect from you to make automated business decisions.

The legal basis on which we collect and process the personal data described above depends on the personal information concerned and the specific context in which we collect it. However, we will only use your personal information where we:

- 1. Have your consent to do so;
- 2. Need the personal data to perform and deliver a contract in place with you;
- 3. Need to process your personal information for our legitimate interests and only where our legitimate interests are not overridden by your data protection interests or fundamental rights and freedoms;
- 4. Have a legal obligation to collect personal information from you.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time, and advise you whether the provision of your personal information is mandatory or not (as well as the possible consequences if you do not provide your personal information).

Information security

Cyber Guarded will take all steps reasonably necessary including policies, procedures and security controls to ensure that your data is treated securely and protected from unauthorised and unlawful access and/or use, and in accordance with this notice.

Cyber Guarded maintains Cyber Essentials Plus Certification.

Recipients of personal data

We do not share information about you with any of our suppliers. If this situation changes we will inform you who will process the data on our behalf and the nature of the data processing. We will only undertake this data sharing on the basis of our legitimate interests.

International transfer of personal data

We do not envisage transferring any information about or relating to individuals to any third party outside of Cyber Guarded who is located outside of the European Economic Area.

Data retention period

We will hold information about you in our data systems only for as long as we need it for the purpose for which we collected it, which is as follows:

- 1. As long as you continue to be an active customer in use of our services (including purchasing services and engaging with emails) we will retain and process information about you. In such cases, you will be considered to be an 'active' customer. If you have not been 'active' as a customer for a period of three years, Cyber Guarded will annually delete/anonymise any personal data held relating to you.
- 2. Personal data gathered as part of the delivery of professional or managed services about you, or employees or customers will be maintained for the minimum document period as defined by regulation and/or legislation. If this is not defined then it will be held for a maximum of 3 years.
- 3. Personal data linked to the processing of insurance claims, subject access requests, disputes, disciplinary or legal matters will only be kept for as long as it necessary for those purposes, as each is applicable.

IP addresses and cookies

We may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive.

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

Cookies on <u>www.cyberguarded.com</u> and <u>www.cyberguarded.com</u>:

- 1. GooglePPC: This is used for Google AdWords advertising conversion tracking
- 2. _utma: This is used for Google analytics tracking (website performance)
- 3. _utmc: This is used for Google analytics tracking (website performance)
- 4. _utmz: This is used for Google analytics tracking (website performance)

- 5. 1P_JAR: This is used for Google analytics tracking (website performance)
- 6. BizoID: This is used for LinkedIn Advertising
- 7. CONSENT: This is used for Google analytics tracking (website performance)
- 8. NID: This is used for Google analytics tracking (website performance)
- 9. UserMatchHistory: This is used for LinkedIn Advertising
- 10. bcookie: This is used for LinkedIn Advertising
- 11. bscookie: This is used for LinkedIn Advertising
- 12. gwcc: This is used for Google analytics tracking (website performance)
- 13. lang: This is used for LinkedIn Advertising
- 14. lidc: This is used for LinkedIn Advertising

Your rights as a data subject

Data protection laws grant you, as a Data Subject, certain information rights, which are summarised below:

- 1. Right to be informed You have the right to know what data we collect and why and how we process it.
- 2. Right of access You have the right to obtain a copy of information we hold about you
- 3. Right of rectification If you feel that any data that we hold about you is inaccurate, you have the right to ask us to correct or rectify it.
- 4. Right of erasure You also have a right to ask us to erase information about you where you can demonstrate that the data we hold is no longer needed by us, or if you withdraw the consent upon which our processing is based, or if you feel that we are unlawfully processing your data.
- 5. Right to restriction of processing You have a right to request that we refrain from processing your data where you contest its accuracy, or the processing is unlawful and you have opposed its erasure, or where we do not need to hold your data any longer but you need us to in order to establish, exercise or defend any legal claims, or we are in dispute about the legality of our processing your personal data.
- 6. Right to Portability You have a right to receive any personal data that you have provided to us in order to transfer it onto another data controller where the processing is based on consent and is carried out by automated means. This is called a data portability request.
- 7. Right to Object You have a right to object to our processing your personal data where the basis of the processing is our legitimate interests including but not limited to direct marketing and profiling.
- 8. Right to Withdraw Consent You have the right to withdraw your consent for the processing of your personal data where the processing is based on consent. You have the right to opt-out of marketing communications we send to you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing emails we send you. To opt out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided below.

Changes to our privacy policy

Any changes we may make to our Privacy Notice in the future will be posted on our website and, where appropriate, notified to you by date-stamped communication.

Marketing Communications

If you would like to opt out of our marketing communications, please email us at <u>info@cyberguarded.com</u> from the email you wish to unsubscribe.

How to contact us

If you wish to contact us about your personal data or exercise any of the rights described above please contact: info@cyberguarded.com

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