

Procedure: Privacy Policy

Summary

The purpose of this procedure is to define the requirements for providing an infrastructure capable of meeting the operational, training and general administration requirements of ZAM Secure limited.

The policy describes in detail the method by which the strategy is implemented.

The Office Manager is responsible for the implementation and management of this procedure.

Revision and Approval

Rev.	Date	Nature of Changes	Approved By
1	30 th March 2026	Original Issue	C Stebbing
2			
3			

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ZAM Secure Limited Privacy Statement

Use of Site

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Our Rights

We reserve the right to:

- ✚ Modify or withdraw, temporarily or permanently, the website (or any part thereof) with or without notice to you and you confirm that we shall not be liable to you or any third party for any modification to or withdrawal of the Website; and/or
- ✚ Change these Conditions from time to time and your continued use of the Website (or any part thereof) following such change shall be deemed to be your acceptance of such change. It is your responsibility to check regularly to

determine whether the Conditions have been changed. If you do not agree to any change to the Conditions then you must immediately stop using the Website.

- ✚ We will use our reasonable endeavours to maintain the Website. The Website is subject to change from time to time. You will not be eligible for any compensation because you cannot use any part of the Website or because of failure, suspension or withdrawal of all or part of the Website due to circumstances beyond our control.
- ✚ We have the right, but not the obligation, to monitor any activity and content associated with the Website. We may investigate any reported violation of these Conditions or complaints and take any action that we deem appropriate (which may include, but is not limited to issuing warnings, suspending, terminating or attaching conditions to your access and/or removing any materials from the Website).

Privacy Policy

We are committed to protecting your privacy. This privacy policy applies to all the web pages related to this website. All the information gathered in the online forms on the website is used to personally identify users that subscribe to this service. The information WILL NOT be used for anything other than what is stated in the Terms & Conditions of use for this service. None of the information will be sold or made available to anyone. The Site may collect certain information about your visit, such as the name of the Internet Service Provider and the Internet Protocol (IP) address through which you access the Internet; the date and time you access the Site; the pages that you access while at the Site and the Internet Address of the Web site from which you linked directly to our site. This information is used to help improve the Site, analyse trends, and administer the Site. We may need to change this policy from time to time in order to address new issues and reflect changes on our site. We will post those changes here so that you will always know what information we gather, how we might use that information, and whether we will disclose that information to anyone. Please refer back to this policy regularly. If you have any questions or concerns about our privacy policy, please send us an E-Mail. By using this website, you signify your acceptance of our Privacy Policy. If you do not agree to this policy, please do not use our site. Your continued use of the website following the posting of changes to these terms will mean that you accept those changes.

Email Disclaimer

This website has the ability to send you emails. These messages are privileged and private communication and may be read, copied and used only by the intended recipient (s). If you are not an intended recipient, please let us know by return email. Please then delete the message and do not disclose its contents to any person. Neither the sender nor his/her employer accepts any liability whatsoever as a result of the further dissemination of this message.

While every effort is taken to ensure that the email message and any attachments are free from viruses, the sender and his/her employer cannot be held liable in the unlikely event that a virus is transmitted to the recipient's computer systems. The recipient is

responsible for maintaining suitable anti-virus mechanisms to protect its computer systems.”

The Conditions will be exclusively governed by and construed in accordance with the laws of South Africa whose Courts will have exclusive jurisdiction in any dispute, save that we have the right, at our sole discretion, to commence and pursue proceedings in alternative jurisdictions.

Privacy Policy

This is the privacy policy for the website of ZAM Secure Limited, a company registered in England with registration number 09672841.

ZAM Secure Limited respects your privacy and is committed to protecting your personal data.

This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format with subheadings set out below. Please also use the Glossary below to understand the meaning of some of the terms used in this privacy policy.

This policy contains the following sections.

1. Important information and who we are.
2. The data we collect about you.
3. How your personal data is collected.
4. How we use your personal data.
5. Disclosures of your personal data.
6. International transfers.
7. Data security.
8. Data retention.
9. Your legal rights.
10. Glossary.

Purpose of this privacy policy

This privacy policy aims to give you information on how ZAM Secure Limited collects and processes your personal data through your use of this website, including any data you may provide through this website when you complete an online form or use the WhatsApp chat function.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

ZAM Secure Limited is the controller and responsible for your personal data (collectively referred to as “ZAM Secure”, “we”, “us” or “our” in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us on email info@zamsecure.co.uk

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under review. This version was last updated in March 2026.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

1. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

-  **Identity Data** includes Full name.
-  **Contact Data** includes Contact number, Email address, Country.

- ✚ **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- ✚ **Usage Data** includes information about how you use our website, products and services.
- ✚ **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

For website visitors, we do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). For website visitors, we do not collect any information about criminal convictions and offences.

1. How is your personal data collected?

We use different methods to collect data from and about you including through:

- ✚ **Direct interactions.** You may give us your Identity Data and Contact Data by filling in forms or by corresponding with us by email or otherwise.
- ✚ **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details.
- ✚ **Third parties.** We will receive personal data about you from various third parties including website analytics providers including Google

1. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we are discussing or performing a contract with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a lawful basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below a description of all the ways we plan to use your personal data, and which of the lawful bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

Purpose/Activity: To discuss our services online.

Type of data: (a) Identity, (b) Contact.

Lawful basis for processing including basis of legitimate interest: Performance of a contract, including a prospective contract.

Purpose/Activity: To manage our relationship with you.

Type of data: (a) Identity, (b) Contact, (c) Marketing and Communications.

Lawful basis for processing including basis of legitimate interest: (a) Performance of a contract with you; (b) Necessary to comply with a legal obligation; (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services).

Purpose/Activity: To administer and protect our business and this website.

Type of data: (a) Identity, (b) Contact, (c) Technical.

Lawful basis for processing including basis of legitimate interest: (a) Necessary for our legitimate interests (for running our business and website); (b) Necessary to comply with a legal obligation.

Purpose/Activity: To deliver relevant website content and advertisements to you.

Type of data: (a) Identity, (b) Contact, (c) Usage, (d) Marketing and Communications, (e) Technical

Lawful basis for processing including basis of legitimate interest: Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

Purpose/Activity: To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.

Type of data: (a) Technical, (b) Usage

Lawful basis for processing including basis of legitimate interest: Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

Purpose/Activity: To make suggestions and recommendations to you about goods or services that may be of interest to you.

Type of data: (a) Identity, (b) Contact, (c) Technical, (d) Usage, (e) Marketing and Communications

Lawful basis for processing including basis of legitimate interest: Necessary for our legitimate interests (to develop our products/services and grow our business)

Promotional offers from us

We may use your Identity, Contact, Technical and Usage Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time].

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a contract.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookies policy.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the lawful basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

1. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes described above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Specific third parties:

WhatsApp

Our website has a WhatsApp chat function. The privacy policy for this function is [here](#)

Google

Our website uses functionality from Google. Google's privacy statement is [here](#)

WordPress.org

Our website uses features from wordpress.org for functionality. The privacy policy for this provider is [here](#)

- ✚ Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

1. International transfers

The specific third parties listed above are US-based companies that provide website tools. International transfers to these specific third parties is protected under the EU-US Privacy Shield. You will find further details in their respective privacy policies, linked to above.

1. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

1. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

We will retain website data for 7 years unless otherwise stated.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You usually have a right to.

-  *Request access to your personal data.*
-  *Request correction of your personal data.*
-  *Request erasure of your personal data.*
-  *Object to processing of your personal data.*
-  *Request restriction of processing your personal data.*
-  *Request transfer of your personal data.*
-  *Withdraw consent.*

LAWFUL BASES

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

External Third Parties

- ✚ Service providers acting as processors based in the EU or EEA who provide IT and system administration services.
- ✚ Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the EU or EEA who provide consultancy, banking, legal, insurance and accounting services.
- ✚ HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who may require reporting of processing activities in certain circumstances.
- ✚ The Financial Conduct Authority in their capacity in relation to our anti-money-laundering supervision as an Annex-i Financial Institution.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- ✚ If you want us to establish the data's accuracy.
- ✚ Where our use of the data is unlawful but you do not want us to erase it.
- ✚ Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- ✚ You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

You also have a right to make a complaint to the Information Commissioner's Office via the website www.ico.gov.uk or by post to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

If you have any complaint, we request that you allow us an opportunity to resolve any complaint you might have in the first instance. (info@zamsecure.co.uk)

Shair Khan

Manging Director

Signed Date: 30th March 2026