



Trustek Privacy Policy

Date of Policy	Review Date	Version	Prepared By	Approved By
February 2026	February 2027	V1	Charlotte Brady	Freddie Pritchard-Smith

1. Purpose

This Privacy Policy outlines the lawful basis under which Trustek Group Ltd. (Trustek) processes personal data in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). This describes the collection, use, transfer and retention of personal data as well as individuals' rights regarding their data.

This Policy also ensures transparency in how Trustek protects personal data and outlines the procedures for accessing, correcting, and controlling your data.

We may update this policy from time to time to reflect changes in the law and/or our privacy practices. We encourage you to review this Privacy Policy whenever you visit our website.

2. Who We Are

Trustek Group Ltd. is a Company registered in England and Wales (number 12712436). This Privacy Policy applies to all entities in the group. Trustek and its subsidiaries' registered address is 2 Oak Court, North Leigh Business Park, Oxfordshire, United Kingdom, OX29 6SW.

3. The Lawful Basis For Processing Personal Data

Trustek processes personal data under the following lawful bases, ensuring we comply with the UK GDPR and other applicable data protection laws:

- **Legitimate Interests:** We process personal data to conduct our core activities such as research, consulting, online auditing, and event production, maintaining records, accounts, and administrative services.
- **Performance of a Contract:** We process personal data as necessary to perform or take steps to enter into a contract.
- **Legal Obligations:** We process personal data to comply with legal and regulatory obligations, including safeguarding, police investigations, and immigration requirements.
- **Consent:** In some cases, we may process personal data based on explicit consent, such as participation in projects, events or marketing communications.

4. Processing 'Special Categories Of Data'

Certain data, known as 'special categories of data', such as racial or ethnic origin, religious beliefs, sexual orientation, and physical or mental health, require additional protection under the law.

When we process special category data, we must meet one of the conditions in the data protection legislation (Article 9 of the UK GDPR). Usually, this will be with the explicit consent of the individual but other examples of situations where we process special category data include:

- To meet our employment obligations, such as health and safety requirements
- For reasons of public interest in the area of public health
- For reasons of substantial public interest, such as ensuring equality of opportunity or treatment or protecting the public against dishonesty
- For research purposes, where such research is in the public interest; and
- To manage legal claims and proceedings.

5. Personal Information We Collect

We collect personal information for specific purposes, based on your interaction with Trustek, including:

5.1 Applying for a job to work with us

We collect personal data via the employment application and recruitment process, and when you enter into a contract as an employee of Trustek. Data gathered during the recruitment process is used for shortlisting and interviewing purposes and for equality and diversity monitoring. The processing of employee personal data includes payroll and pension administration, management of absence records, performance management, and disciplinary and grievance procedures.

5.2 Attending events or involvement in our projects

We gather information on those who participate in projects or attend our events, including names and e-mail addresses.

5.3 Research & auditing

Some personal data is collected through our research and auditing activities. This may include details about a person, such as their name and work details, and their views or opinions on specific research areas. We only collect personal data that is needed for research purposes and only keep the information in a way that enables individuals to be identified, for as long as is necessary.

5.4 Website use and social media interaction

We collect data related to your usage of our website. We may use logins, cookies, device information and internet protocol ("IP") addresses to identify you and log your use. This helps us to understand your engagement with our content, allowing us to improve the targeting of our marketing communications as detailed below in the section on Profiling. Our website and platforms may include links to third-party websites or services not operated by Trustek. We are not responsible for the privacy practices or content of these external sites. We recommend you review their privacy notices before providing personal data. We may process personal data collected through this website or other electronic networks used by Trustek, for the purposes of marketing, public relations and general advice services.

5.5 Your device and location

When you visit or leave our website (including our plugins or cookies or similar technology on the sites of others), we receive the URL of both the site you came from and the one you go to next. We also get information about your IP address, proxy server, operating system, web browser and add-ons, device identifier and features, and/or ISP or your mobile carrier. If you use our website from a mobile device, that device will send us data about your location. Most devices allow you to prevent location data from being sent to us and we will honour your settings.

5.6 Messages

We collect information about you when you send, receive, or engage with messages in connection with our Services. Messages are stored for up to three years and are accessed only if we receive a complaint or to perform an aggregated analysis of usage.

5.7 Profiling

Profiling is a common technique used in direct marketing and involves analyzing data to improve the targeting of communications. Trustek uses profiling techniques to help ensure our communications are relevant. We do not use profiling to make any automated decisions that have a legal effect. The data may have been provided to Trustek by our clients when responding to our marketing campaigns, or when using our website, or social media sites such as Instagram. It may also have been provided by external organisations as described below.

When building a profile, we may analyze geographic, demographic and other information relating to you, as well as your previous responses to our marketing and engagement campaigns. We do this to determine whether we believe a particular marketing campaign might be of interest. Some of the data is provided by external organisations and may be provided at an aggregate level (e.g. by postcode). This helps to maximise the effectiveness of our campaigns and to minimise the wastage that would result from sending marketing information where it is not of interest.

6. How We Share Information

6.1 Our Work

We do not share our data with third parties unless compelled to do so or in a strictly controlled way to certain Service Providers working on our behalf as set out below.

6.2 Service Providers

We use others to help us provide our Services, including our website and other core online services, including our Customer Relationship Management System (CRM), Content Management System, single-sign-on (SSO) and mailing tools (e.g. for maintenance, analysis, audit, payments, fraud detection, marketing and development).

6.3 Legal Disclosures

It is possible that we will need to disclose information about you when required by law, warrant, or other legal process or if we have a good faith belief that disclosure is reasonably necessary to (1) investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (2) enforce our agreements with you; (3) investigate and defend ourselves against any third-party claims or allegations; (4) protect the security or integrity of our Services; or (5) exercise or protect the rights and safety of Trustek employees.

6.4 Cross-Border Data Transfers

We process data both inside and outside of the United Kingdom. Where we transfer data, we do so either within the EEA, under the 'Adequacy Regulations', 'Appropriate Safeguards' or under one of the exclusions permitted by the UK GDPR.

7. Data Retention

Personal data is stored in line with Trustek's Data Protection Policy. We retain the personal data you provide as needed to carry out our Services, to comply with legal obligations (including law enforcement requests), meet our regulatory and financial requirements, resolve disputes, maintain security, prevent fraud and abuse, or fulfil your request to "unsubscribe" from further messages from us.

If you are a member of staff, should you cease working for Trustek we will retain your personal data for six years after you leave.

8. Your Right To Access And Control Your Personal Data

You have several rights under data protection legislation:

- **Information from you** – where personal data is collected from you, you have the right to information about the collection and use of your personal data. This includes details about the

purpose(s) for processing and retention periods for that personal data, and who it will be shared with.

- **Information about you from other sources** – where your data is not obtained from you, you have the same right to the information above, as well as details about what personal data is collected and by whom.
- **Access** – you have the right to confirmation of whether or not we are processing your personal data and to obtain a copy of your data. This is known as a subject access request.
- **Rectification** – you have the right to rectify any inaccuracies in personal data concerning you.
- **Erasure** – you have the right to be forgotten in some circumstances, i.e. to have your data erased.
- **Restriction** – you have the right to restrict the processing of your personal data in certain ways. Where there is a request to rectify, erase or restrict the processing of data, we will let any recipients of that data know, where possible. You have the right to know who those recipients are.
- **Data portability** – you have the right to receive your personal data in a structured, commonly used and machine-readable format, and to transfer your data to another controller.
- **Objection** – you have the right to object to certain processing of your personal data by us, such as direct marketing.
- **Decision making** – you have the right not to be subject to a decision based solely on automated processing, including profiling.
- **Withdrawal of consent** – where your consent is the legal basis for our processing, you have the right to withdraw your consent.

9. Other Important Information

Cookies

Our website uses cookies to collect information and improve user experience. For further details, please review our Cookies Policy.

Security

We use appropriate technical and organisational measures to protect personal data from unlawful processing, accidental loss, or damage. Our security measures are regularly reviewed to prevent vulnerabilities.

Content provided by third parties published on our website

We often publish and link to information from clients, solutions suppliers, and others. We are not responsible for the accuracy of either the content or any personal data contained within such content.

10. Further Information

If you would like more information, or have any questions about this policy, please contact our Data Protection team by emailing us at hello@trustek.uk

11. Related Policies and Documents

- Trustek Employee Data Protection Policy

12. Review and Updates

This policy will be reviewed regularly and may be amended to reflect legal, regulatory, or operational changes.