

CUSTOMER PRIVACY POLICY

BACKGROUND:

SCH CREATE LTD, trading as UK Cyber Plan a company private limited company, incorporated and registered in England and Wales with company number 16446599 whose registered office is at 50 Geary Road, London, England, NW10 1HH (“**We/Us/Our**”) understands that your privacy as a Customer is important to you and that you care about how your personal data is collected, used and shared. We respect and value the privacy of Our Customers and Customers and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. If you do not accept and agree with this Privacy Policy, you must stop using Our Services immediately.

1. Definitions and Interpretation

Save as expressly narrated in this Policy, defined terms shall have the same meaning as those defined in Our Terms and Conditions and found at www.ukcyberplan.co.uk/clientlegaldocuments

2. Information About Us

- 2.1 Our Services are owned and operated by Us.
- 2.2 Our Data Protection Officer is: Sapna Chadha
- 2.3 Email address: sapna@ukcyberplan.co.uk

3. What Does This Policy Cover?

- 3.1 This Privacy Policy applies only to Our use of personal data gathered by Us in any Customer’s (“**you**” or “**your**”) use of Our Services.

4. What Is Personal Data?

- 4.1 Personal data is defined by the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR) (where applicable in relation to the storage retention and processing of EU personal data), the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (the “UK GDPR”), as it forms part of the law of England and Wales, Scotland, and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 and the Data Protection Act 2018 (collectively, “**the Data**”

Protection Legislation) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

- 4.2 Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. **What Are Your Rights?**

Under the Data Protection Legislation, individuals have the following rights, which We will always work to uphold:

- a) The right to be informed about Our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact Us to find out more or to ask any questions using the details in Part 14.
- b) The right to access the personal data We hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by Us is inaccurate or incomplete. Please contact Us using the details in Part 14 to find out more.
- d) The right to be forgotten, i.e. the right to ask Us to delete or otherwise dispose of any of your personal data that We hold. Please contact Us using the details in Part 14 to find out more. (We only hold personal data for certain periods of time, as explained in Part 8 but if you would like Us to delete it sooner, please contact Us using the details in Part 14). Please note that deletion of certain personal data may prevent Our Services from functioning;
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to Us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if We are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to Us directly, We are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask Us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to any automated decision-making and profiling. For more

information please see Part 7.

- 5.2 For more information about Our use of your personal data or exercising your rights as outlined above, please contact Us using the details provided in Part 14.
- 5.3 It is important that your personal data is kept accurate and up to date. If any of the personal data We hold about you changes, please keep Us informed as long as We have that data.
- 5.4 Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.
- 5.5 If you have any cause for complaint about Our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.
- 5.6 We would welcome the opportunity to resolve your concerns Ourselves, however, so please contact Us first, using the details in Part 14. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office details of which can be found here <https://ico.org.uk/>.

6. **What Data Do We Collect and How?**

- 6.1 Depending upon your use of Our Services We collect and hold some or all the personal and non-personal data set out below, using the methods also set out in the table.
- 6.2 We do not collect certain 'special category' or 'sensitive' personal data. Special Category data is defined as:
 - a) personal data revealing racial or ethnic origin;
 - b) personal data revealing political opinions;
 - c) personal data revealing religious or philosophical beliefs;
 - d) personal data revealing trade union membership;
 - e) genetic data;
 - f) biometric data (where used for identification purposes);
 - g) data concerning health;
 - h) data concerning a person's sex life;
 - i) personal data pertaining to children (any person under the age of 18 years); and
 - j) data concerning a person's sexual orientation.

Data Collected	How We Collect the Data
Identity Information including: name, title, date of birth	Collected through 1) correspondence with you; 2) through the use of client relationship management tools; 3) through a continuing business relationship with you; and 4) through attendance of meetings and events with you.
Contact information including: email addresses, telephone numbers, residential addresses	1) correspondence with you; 2) through the use of client relationship management tools; 3) through a continuing business relationship with you; and 4) through attendance of meetings and events with you.
Business information including: Job title and profession	1) correspondence with you; 2) through the use of client relationship management tools; 3) through a continuing business relationship with you; and 4) through attendance of meetings and events with you.
Profile information including: Post codes, preferences and login details	1) correspondence with you; 2) through the use of client relationship management tools; and 3) through a continuing business relationship with you.
Technical information including:	1) correspondence with you via our website and email;

<p>IP address, web browser type and version, operating system and a list of URLs starting with a referring site, your activity on Our Services, and the site you exit to.</p>	<p>2) through the use of client relationship management tools.</p>
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7. How Do We Use Your Personal Data?

7.1 Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how We may use your personal data, and our lawful bases for doing so:

What We Do/ Lawful Basis/ requirement for collecting personal data	What Data We Use
<p>Providing and managing your access to Our Services.</p> <p>Legal obligation/ Contractual performance/ Legitimate interests.</p>	<p>Business information including: job title and profession;</p> <p>Profile information including: post codes, preferences and login details.</p> <p>Business information including: job title and profession;</p>
<p>Personalising and tailoring your experience on Our Services.</p> <p>Contractual performance/ Legitimate interests.</p>	<p>Technical information including: IP address, web browser type and version, operating system and a list of URLs.</p> <p>Profile information including: post codes, preferences and login details.</p> <p>Business information including: job title and profession;</p>

	gathered from your use of Our Services.
<p>Administering Our Services. Legal obligation/ Contractual performance/ Legitimate interests.</p>	<p>Business information including: job title and profession; Profile information including: post codes, preferences and login details; Business information including: job title and profession Technical information including: IP address, web browser type and version, operating system and a list of URLs gathered from your use of Our Services.</p>
<p>Supplying Our Products and/ Services. Legal obligation/ Contractual performance/ Legitimate interests.</p>	<p>Identity Information including: name, title, date of birth and Profile information including: post codes, preferences, and login details; Technical information including: IP address, web browser type and version, operating system and a list of URLs; Health information gathered from your use of Our Services; Biometric Data gathered from your use of Our Services.</p>

<p>Personalising and tailoring Our Products and/ Services for Customers.</p> <p>Contractual performance/ Legitimate interests.</p>	<p>Identity Information including: name, title, date of birth and gender.</p> <p>Profile information including: post codes, preferences, and login details;</p> <p>Technical information including: IP address, web browser type and version, operating system and a list of URLs;</p> <p>gathered from your use of Our Services.</p>
<p>Communicating with Customers.</p> <p>Contractual performance/ Legitimate interests.</p>	<p>Identity Information including: name, title and</p> <p>Contact information including: email addresses and telephone numbers.</p>

- 7.2 With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and/or telephone and/or text message and/or post with information, news, and offers on Our products and Services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with Our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.
- 7.3 We do not use any automated systems for carrying out decision-making and profiling (making a decision solely by automated means without any human involvement).
- 7.4 We will only use your personal data for the purpose(s) for which it was originally collected unless We reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If We do use your personal data in this way and you wish Us to explain how the new purpose is compatible with the original, please contact Us using the details in Part 14.
- 7.5 If We need to use your personal data for a purpose that is unrelated to, or

incompatible with, the purpose(s) for which it was originally collected, We will inform you and explain the legal basis which allows Us to do so.

- 7.6 In some circumstances, where permitted or required by law, We may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

8. **How Long Will We Keep Your Personal Data?**

- 8.1 We do not keep personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):

- 8.1.1 We retain personal data pertaining to a Customer for as long as we have a contract with that Customer and for a period of 3 years after expiry/ termination of that said contract.

9. **How and Where Do We Store or Transfer Your Personal Data?**

- 9.1 We will store some of your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

- 9.2 We will store your personal data OR store some of your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfers of personal data to the EEA from the UK are permitted without additional safeguards.

- 9.3 -We store some of your personal data in countries outside of the UK and the EEA. These are known as "third countries". We will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and the EEA and under the Data Protection Legislation as follows:

- 9.4 We will use specific approved contracts which ensure the same levels of personal data protection that apply under the Data Protection Legislation. For further information, please refer to the Information Commissioner's Office.

- 9.5 Please contact us using the details below in Part 14 for further information about the particular data protection safeguards used by us when transferring your personal data to a third country.

- 9.6 The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- 9.6.1 limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;

9.6.2 procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner’s Office where we are legally required to do so;

9.6.3 We implement appropriate technical and organisational security measures including access controls, secure systems, encryption where appropriate, and alignment with recognised frameworks such as Cyber Essentials and NCSC guidance.

10. Do We Share Your Personal Data?

10.1 If We sell, transfer, or merge parts of Our business or assets, your personal data may be transferred to a third party. Any new owner of Our business may continue to use your personal data in the same way(s) that We have used it, as specified in this Privacy Policy.

10.2 In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if We are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10.3 We may share your personal data with other companies in Our group for administration and company management purposes. This includes subsidiaries.

10.4 We sometimes contract with the following third parties to process data to supply certain products Services and process data on Our behalf:

Recipient	Activity Carried Out	Sector	Location of Data
Zoho Corporation – Data Processor	Customer relationship management (CRM), storage and management of client, prospect, and business contact data, and communication tracking	Technology / Customer relationship management	UK / EEA

Microsoft 365 / SharePoint– Data Processor	Secure storage, management, and sharing of internal documents, client information, and personnel records	Technology / Cloud storage and collaboration	UK / EEA / USA
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- 10.5 If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party’s obligations under the law, as described above in Part 9.
- 10.6 If you have been referred to take Our Services by your employer, we may share only your name and contact details with your employer.
- 10.7 If any personal data is transferred outside of the UK or European Union, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK/ European Union and under the Data Protection Legislation, as explained above in Part 9.

11. How Can I Control My Personal Data?

- 11.1 In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Services, you may be given options to restrict Our use of your personal data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails).
- 11.2 You may also wish to sign up to one or more of the preference Services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these Services will not prevent you from receiving marketing communications that you have consented to receiving.

12. Can I Withhold Information?

- 12.1 You may restrict Our access to certain personal data however this may negatively impact Our ability to Provide the Services.

13. **How Can I Access My Personal Data?**

- 13.1 If you want to know what personal data We have about you, you can ask Us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.
- 13.2 All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 14.
- 13.3 There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover Our administrative costs in responding.
- 13.4 We will respond to your subject access request within 28 days and, in any case, not more than one month of receiving it. Normally, We aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date We receive your request. You will be kept fully informed of Our progress.

14. **How Do I Contact You?**

- 14.1 To contact Us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: sapna@ukcyberplan.co.uk

Postal Address: 50 Geary Road, London, NW10 1HH

15. **Changes to this Privacy Policy**

- 15.1 We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if We change Our business in a way that affects personal data protection.
- 15.2 If the changes materially affect the way in which we collect, process, retain or store your personal data, you will be required to accept these revised terms. Any minor changes will be deemed to have been accepted on your first use of Our Services or use of Our Services following the minor alterations. We recommend that you check this page regularly to keep up to date. This Privacy Policy was last updated on **27th March 2026**.