Privacy Notice

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Document Information

Notices

References

Referenced Document or Web Site	Version or Date	Abbreviation
None		

Change and Review History

Version	Date	Person	Action
1.0	June 2024	Luke Drewer	First version

Table of Contents

1. Introduction

PalisadeSECURE Ltd (12700238) with registered office at 434 London Road, Leigh-On-Sea, England, SS9 2UL. ("we" or "us" or "our" or "The Company") is committed to working to highest standards of ethical conduct and in accordance with the General Data Protection Regulation (GDPR), as enacted in the UK by the Data Protection Act 2018, and the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR).

In relation to the Personal Data we collect in the course of our relationship with you ("you" or "your"), we shall be acting as a Data Controller.

This Privacy Notice describes how we collect and use your Personal Data during our relationship with you and providing services to you, in accordance with the GDPR and all applicable data protection legislation.

We have appointed a Privacy Officer, to inform and direct our use of the Personal Data, who may be contacted by email at cyberteam@cyber-trust.co.uk if you have any queries or concerns.

Capitalised words not defined herein shall bear the meanings associated with them under the GDPR.

2. Data Protection Principles

In adhering to the GDPR we are committed to protecting Personal Data in accordance with the following:

1. Data must be processed lawfully, fairly and in a transparent manner.
2. Data must be obtained for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
3. Data processed must be adequate, relevant and limited to what is necessary.
4. Data must be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure data that are inaccurate, are erased or rectified without delay.
5. Data must not be kept for longer than is necessary for the purposes for which the data are processed.
6. Data must be processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage, using appropriate technical or organisational measures.

3. Personal Data

The Personal Data, as defined under the GDPR, which we process includes certain information which can be used to identify you.

Although we don't currently collect and/or process Special Category (sensitive) Personal Data, should this change, we shall inform you and explain any further protections that we may implement.

The Personal Data we collect about you is as follows:

Purpose/Activity	Processing financial accounting records, performance of contracts with customers and purchasing goods
Lawful Basis	By Contract
Type of Data	Contact name, email, phone number, job role, title
When	When engaging with you or your company as a customer or a supplier
How Long	No specified limit
Recipients	Finance team

Purpose/Activity	Telecommunication records collected during telephone calls received and made
Lawful Basis	Legitimate interest
Type of Data	Name, phone number, duration of call
When	When engaging with you or your company as a customer or a supplier or as a potential customer or supplier
How Long	No specified limit
Recipients	Finance team

Purpose/Activity	Email and instance message communication records collected during email and instant message communications received and made
Lawful Basis	Legitimate interest
Type of Data	Name, email, any other unstructured information communicated
When	When engaging with you or your company as a customer or a supplier or as a potential customer or supplier
How Long	No specified limit
Recipients	The intended recipient, relevant other recipients

Purpose/Activity	Marketing records: contact details for the purposes of soliciting business
Lawful Basis	Legitimate interest
Type of Data	Contact name, phone number, email, job role, title, unstructured notes
When	When engaging with you or your company as a customer or a supplier or as a potential customer or supplier
How Long	No specified limit
Recipients	Marketing team, relevant other recipients

4. Other Parties

In the course of our relationship with you and providing services to you, we currently engage the following parties as Data Processors, all of whom we have assessed for their compliance with the GDPR:

Processor	Service	Data	HQ
Microsoft Office 365	Electronic mail, file sharing and storage, VOIP phone system, Skype and Teams messaging	EEA	US
LinkedIn	Personal messaging and research	US	US
Quickfile	Accounting and finance system	US	US
Vodafone	Mobile communications via data, voice and SMS and internet service provider	EEA	EEA
HubSpot	CRM systems	US	US

5. Transferring Personal Data to a Country Outside the EEA

Other than as set out above, we do not transfer Personal Data outside the European Economic Area (EEA) if you are based within the EEA.

If you are based outside of the EEA, in order to provide our services, we shall be obliged to send the Personal Data outside of the EEA, in order to reach you.

Whenever we transfer Personal Data to a Data Processor outside of the EEA, we have ensured that appropriate measures, as allowed for by the GDPR, are in place to continue the ongoing protection of the Personal Data.

6. Third-Party Links

Where we provide 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 the Employee. We do not control these third-party websites and we are not responsible for their privacy statements. We encourage all Employees to read the privacy notice of every website visited.

7. Keeping in Touch

We may keep you up to date with information about related services we can offer either directly or through third-parties.

We will not share your Personal Data with other companies.

If you decide you no longer want us to keep in touch with you, you can request that we stop by the method we indicate to you.

8. Rights of Data Subjects

You have the following rights under the GDPR, though some may not always apply depending upon the lawful basis of processing of the Personal Data, or other relevant circumstances:

1. the right to be informed, which encompasses the obligation to provide transparency as to how your Personal Data will be used;
2. the right of access;
3. the right to rectification of data that is inaccurate or incomplete;
4. the right to be forgotten under certain circumstances;
5. the right to block or suppress processing of Personal Data; and
6. the right to data portability which allows parties to obtain and reuse their Personal Data for their own purposes across different services under certain circumstances.

Where you wish to exercise any of the above rights, you should contact us using the contact details provided above.

9. Security of Data

We are committed to taking steps to ensure that your Personal Data is protected, and to prevent any unauthorised access, unauthorised changes, accidental loss, destruction, unlawful processing, equipment failure or human error, and will do this through the continual monitoring of our security systems and by regular training and awareness raising.

Any data breaches will be managed according to The Company's procedures documented in its Incident Management Policy and Procedures.

10. Monitoring

We are committed to monitoring this policy and will update it as appropriate, on an annual basis or more frequently if necessary.

11. Complaints

We try to meet the highest standards when processing Personal Data. For this reason, we take any complaints we receive about our services seriously. We encourage you to bring any issues, in relation to data privacy, to our attention if you think that our processing of your Personal Data is unfair, misleading or inappropriate, by email at cyberteam@cyber-trust.co.uk

You may also contact the Supervisory Authority in the UK, the Information Commissioner's Office, by selecting the appropriate option at https://ico.org.uk/concerns