



BULLETPROOF PRIVACY NOTICE

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1. INTRODUCTION

Bulletproof Cyber Ltd is registered at: 20 Grosvenor Place, London, UK, SW1X 7HN company registration 05490180 and is a leading provider of cyber security and data protection services and is part of the GRC Group.

Bulletproof Cyber Ltd take the protection of your personal data very seriously and strictly adhere to the rules laid out by data protection laws and the UK General Data Protection Regulation (UK GDPR)

This privacy notice gives you information on how we collect and process your personal data through your use of this site and any data you may provide if you contact us regarding our products and services.

We have appointed a data protection officer (DPO) who is responsible for monitoring and providing guidance with our UK GDPR status. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the contact information in section 17 of this privacy notice.

Personal Information is any personal identifiable information, such as your email address, name, home or work address, telephone number, bank details or online identifier, which can directly or indirectly identify you and as defined in Article 4 (1) of the UK GDPR. We refer to it as “Personal Information” here.

2. WHY WE COLLECT YOUR PERSONAL INFORMATION

We collect your personal data for one of the following purposes:

- To manage communications between you and us
- Where we need to perform the contract or taking steps prior to entering into a contract, with you or our clients and suppliers.
- To process payments
- To provide you with information you have requested, or which we may feel may be of relevant interest to you.
- To ensure the safe operation of our website and to monitor the performance of our website.
- To provide dashboards to monitor trends, analyse performance and make informed decisions
- For marketing and advertising purposes or you are an existing customer who has purchased similar products and services from us
- For training purposes
- To provide Human Resources functions and services
- To carry out pre-screening checks and right to work

- To carry out Disclosure and Barring Security Standard (DBSS) checks to ensure that we make safer recruitment decisions
- To conduct surveys and solicit customer feedback.

3. LAWFUL BASIS OF PROCESSING INFORMATION

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where:

- The data subject (you) has given consent to the processing activity taking place.
- If the processing is necessary for the performance of a contract
- If the processing is necessary for compliance with a legal obligation to which the controller is subject
- If the processing is necessary to protect the vital interests of data subjects and that of another person
- If the processing is necessary for the purpose of our legitimate interest. Where legitimate interest is identified as a lawful basis, we will undertake a legitimate interest assessment which is a three- part test covering:
 - **The purpose test** – to identify the legitimate interest.
 - **Necessity test** – to consider if the processing is necessary for the purpose identified.
 - **Balancing test** – considering the individual's interests, rights, or freedoms and whether these override the legitimate interests identified.

4. WHAT INFORMATION WE COLLECT AND WHERE FROM

We collect personal information from our Clients, Customers, Suppliers, Partners and from you, for example, for marketing purposes, reporting, if you register on our website, use the website, provide information on the website, request product information, call us (your call may be recorded), email us, interact with us on social media, Microsoft TEAMS or use any of our services.

Personal Information

The personal information that we may collect, store, and use about you as defined in Article 4 (1) of the UK GDPR, which may include:

- Name
- Address and previous addresses
- Telephone number
- Job title, Role, employer, previous employers and location and qualifications

- Right to work
- Security clearances
- Email address
- Chat conversations on the website and Office 365 environment
- Fax number
- IP addresses & Geographical location
- Transactional information about the services you use and how you interact with us and the services e.g., services viewed, page response times, download errors, length of visit, scrolling, clicks and mouse hovers.
- Browser type
- Browser language
- Operating system
- Device type
- Time zone
- Communication preferences
- Payment information (we do not store card data and are PCI DSS compliant)
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- Training information.

We may use technologies, such as tracking pixels to collect some of the above information from emails we send you. This helps us to focus our marketing to your requirements and provide more relevant emails to you. It also helps us to identify if you are not engaged with our marketing emails.

Special Category Personal Data

We may also process special categories of personal data as defined in Article 9 (1) of the UK GDPR which the UK GDPR singles out as personal data which is more sensitive.

The types of Special Categories of Personal Data that may be processed are:

- a. Political opinions.
- b. Religious or philosophical beliefs.
- c. Trade-union membership.
- d. Genetic or biometric data used to uniquely identify a natural person such, photographs, videos, and telephone recording.

- e. Data concerning a natural person's physical or mental health or condition, sex life or sexual orientation.
 - f. Reports which include screenshots and content of vulnerabilities outcomes
 - g. health data, behaviour issues,
 - h. Sex life or sexual orientation
- (a) We may also collect information from third parties such as Defense.com, Expandi.io, Tailscale, WorkNest Ltd, PlexTrac, Monday.com, Verifile, Hireful Ltd and ZoomInfo, this list is not exhaustive.

Where data relating to criminal activities is concerned the lawful purpose will be dealt with under Article 10 of the UK GDPR and Section 10 of the Data Protection Act 2018.

5. HOW LONG WE KEEP INFORMATION 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, tax, 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.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

6. SECURITY OF PERSONAL INFORMATION

We take the responsibility for protecting your privacy very seriously and we will ensure your data is secured in accordance with our obligations under Data Protection laws. We have in place technical and organisational measures to ensure personal information is secured and to prevent your personal data from being accessed in an unauthorised way, altered, or disclosed. We have in place a robust access control policy which limits access to your personal data to those employees, contractors and other third parties who only have a business need to know. The processing of your personal data will only take place subject to our instruction.

We have policies and procedures to handle any potential data security breaches and data subjects, third parties and any applicable regulators will be notified where we are legally required to do so.

Bulletproof Cyber Ltd is ISO 27001 certified and has also achieved Cyber Essentials and Cyber Essentials Plus Certification. The scope of all these certifications includes all activities the company performs while trading as Bulletproof. The organisation is also PCI DSS compliant.

We have ensured that all employees complete information security and data protection training and refresher training on an annual basis. If you would like more details of the security we have in place, please see "additional information", in section 17 of this policy.

Any payment transactions are encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of the site, you are responsible for keeping this password confidential. We ask that you do not share passwords with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure so we cannot guarantee the security of your information when it is transmitted to our website or from third party websites, any transmission is at your own risk, however we use strict procedures and security features to prevent unauthorised access.

The site may from time to time contain links to and from the websites of our partner networks, advertisers, and affiliates. If you follow a link to any of these websites, we cannot accept any responsibility or liability, and you will have to agree to such company's privacy notice. Please ensure you agree to such policies before submitting your personal data.

We acknowledge that the information you provide may be confidential. We do not sell, rent, distribute, or otherwise make Personal Information commercially available to any third party, but we may share information with The GRC Group, our service providers and our customers for the purposes set out in this Privacy Notice. We will keep your information confidential and protect it in accordance with our Privacy Notice and all applicable laws.

7. CHILDREN'S INFORMATION

We do not knowingly collect information on children. If we have collected personal information on a child, please contact us immediately using the details in section 15 & 17, so we can remove and/or assess review this information without any undue delay.

8. YOUR INDIVIDUAL RIGHTS

In this Section, we have summarised the rights that you have under the UK General Data Protection Regulation (UK GDPR). Some of the rights are complex, and not all the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights. The UK GDPR states that we must respond to your request within one calendar month of receiving your verified request unless our assessment of your request concludes to be complex.

Your principal rights under the UK General Data Protection Regulation unless prohibited by law are:

- Right to Object to processing of your personal information.

- Right to request Access of your personal information
- Right to request to be informed
- Right to request Rectification of your personal information
- Right to request Erasure of your personal information
- Right to request Restricting Processing of your personal information
- Right to make a Portability request of your Personal Data, this right only applies to information you have given us.
- Rights under automation and profiling

If you have any question about these rights, please see "additional information", section 17 of this policy.

9. CONSENT

Where you have given consent for processing, or explicit consent in relation to the processing of special category personal data, you have the right to withdraw this consent at any time, but this will not affect the lawfulness of processing based on consent before its withdrawal.

10. FAILURE TO PROVIDE PERSONAL INFORMATION

Where we need to collect personal data by law or in order to process your instructions or perform a contract we have with you, or to enter into and you fail to provide that data when requested, we may not be able to carry out your instructions or perform the contract we have or are trying to enter into with you. In this case, we may have to cancel our engagement or contract you have with us, but we will notify you if this is the case at the time.

11. COOKIES

Cookies are small pieces of information that are issued to your computer or mobile device when you interact with our website, and which store and sometimes track information about your use of our website. A banner is displayed on our website giving you clear information about the purpose, storage, and access to the cookie and to confirm you have given consent before it captures data. Please see our cookies policy for full details of the cookies used on link: [Cookie Policy \(bulletproof.co.uk\)](https://bulletproof.co.uk/cookie-policy)

12. AUTOMATED DECISION MAKING

Your personal data is not used in any automated decision making (a decision is not made solely by automated means without any human involvement).

13. TRANSFERS TO THIRD PARTIES

Bulletproof may disclose your personal data, listed in section 4 to some third parties to help us deliver our services/products or for marketing purposes. All third parties are contractually bound to protect the personal data we provide to them. We may use several or all the following categories of recipients:

- The GRC Group
- Business partners, suppliers, contractors for the performance of any contract we enter into with them or you.
- Business partners, where you have provided consent to receive marketing information about our products and services or you are an existing customer who has purchased similar products and/or services from us.
- For administrative purposes and to provide services to you
- Third parties that support us to provide products and services e.g., IT support, hosting providers, cloud-based software services, providers of telecommunications equipment, providing penetration test reports.
- Marketing/PR services providers
- Payment service providers
- Recruitment service providers including screening and security checks
- Professional advisors e.g., lawyers, auditor
- Data protection officer in line with Article 38 of the UK GDPR
- Web analytics and search engine provider to ensure the continued improvement and optimisation of our website.

14. TRANSFERS OUTSIDE OF THE UK

In this section, we provide information about the circumstances in which your personal data may be transferred and stored in countries outside the UK.

Where we share personal information to third parties outside of the UK any personal information transferred will only be processed on our instruction and we ensure that information security at the highest standard would be used to protect any personal information as required by Data Protection laws.

Where personal data is transferred outside of the UK to a country without an adequacy decision, we will ensure appropriate safeguards are in place prior to the transfer. These could include:

- UK International Transfer Agreements (UK ITAs).
- The Data Protection (Adequacy (United States of America) Regulations 2023
- EU-US Data Privacy Framework and Data Bridge accreditation

- An exception as defined in Article 49 of the UK GDPR

For more information about transfers and safeguarding measures, please contact us using the information in section 17.

15. RIGHT TO COMPLAINT

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading, or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact us via email on dpo@bulletproof.co.uk

By Post: Unit H, Gateway 1000, Whittle Way, Stevenage, Herts, SG1 2FP

By Phone: [+44\(0\)1438 500096](tel:+44(0)1438 500096)

Alternatively, if you are dissatisfied with the outcome of your complaint or any review carried out by us in relation to information we hold about you, you can make a complaint to the Information Commissioner's Office, who oversees the UK GDPR regulations. If you wish to do this, you can contact them at:

By Post: Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

By Website: [Click Here](#)

By Email: [Click Here](#)

By Phone: [0303 123 1113](tel:0303 123 1113) (local rate) or [01625 545 745](tel:01625 545 745) (National rate)

16. EUROPEAN UNION REPRESENTATION

For customers based in the EU, you may contact our representative at eu@bulletproof.co.uk.

17. ADDITIONAL INFORMATION

Your trust is important to us. That is why we are always available to talk with you at any time and answer any questions concerning how your data is processed. If you have any questions that could not be answered by this privacy policy or if you wish to

receive more in-depth information about any topic within it, please contact our DPO via email on dpo@bulletproof.co.uk

18. POLICY REVIEW AND AMENDMENTS

We keep this Policy under regular review. This Policy was last updated on 2 October 2024.

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.



CYBER SECURITY | INFORMATION SECURITY | DATA PROTECTION

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