

PRIVACY POLICY

1 Introduction

We, at Assurestack Solutions Ltd (“we”, “us”, “our” and “Assurestack”) are committed to respecting the privacy of all of those who interact with us.

The following policy therefore outlines how we collect, use, share and otherwise process Personal Data (as hereinafter defined) and includes information on the categories of Personal Data collected by us, the purposes for which it is processed and shared, as well as the rights available to you in your capacity as a “data subject” in respect of your Personal Data. This policy does not, however, apply or extend to our employees (whether current, former or prospective - including any job applicants).

Processing of personal data shall be carried out in accordance with the requirements stipulated under applicable law – including, in particular, the Data Protection Act 2018 and the UK General Data Protection Regulation.

2 What Personal Data do we collect?

The term and expression “**Personal Data**”, for these purposes, may broadly be defined as information that relates to and can identify a particular natural person.

- In offering our services to you, we may collect a variety of Personal Data, based on the nature, duration and extent of your interaction with us. This may include categories of Personal Data such as:
 - **personal details** – including, for example, your name, date of birth, citizenship details, signature, photograph and status of residency;
 - **contact details** – including, for example, your contact number (fixed line and mobile number), email address, permanent address and correspondence address;
 - **state issued identification details** – including, for example, your national identity card number, passport number and tax identification number;
 - **employment details** – including, for example, your designation and professional contact information.

provided, further, that we shall inform you as and where required by applicable law where, and to the extent, that we process any other categories of Personal Data relating to you.

Any processing of Personal Data that is deemed to be a “special category of Personal Data” by applicable law, will be processed in accordance with and subject to the conditions, specifications and restrictions stipulated by applicable law.

3 How do we collect your Personal Data?

- As you interact with us, we may collect your Personal Data in a number of different ways, including from the following sources:
 - **Directly from you** – such as when you register for and use our services, or interact with us *via* telephone, email or our website.
 - **Online** – including through our website and other online platform(s), which, like most other websites, use cookies and other technology to gather details about your interaction with such websites and platforms.
 - **Other third parties** – such as, through service providers, government institutions, statutory bodies and our business partners.

4 Why do we collect your Personal Data?

- We collect and process your Personal Data for a number of legitimate business purposes - which include, but are not limited to, the following:
 - to effectively provide you with our services, including efficient customer support, account management and for the processing of payments;
 - to pursue our business relationship with you, to keep you informed and updated about our service offerings and other business activities;
 - to comply with legal and statutory obligations, protect and enforce our rights, or respond to requests for information issued by government or statutory authorities;
 - for safety or security reasons, such as to detect and / or prevent fraud or the misuse of any of services and for the safety of our personnel and infrastructure; and
 - for our own internal purposes, such as for monitoring, analysing and evaluating the performance of our services and for maintaining internal records.

We may also anonymize, tokenize and / or aggregate Personal Data in a manner where you may no longer be personally identifiable. In such instances, you acknowledge and agree that that Assurestack may utilize such non-Personal Data for any lawful purpose without further notice to you.

5 For how long do we retain your Personal Data?

As a general policy, we process your Personal Data for as long as it may be required to:

- make our services available to you;
- comply with applicable legal and statutory obligations and information requests; and / or

- fulfil the legitimate business purposes for which such Personal Data was collected, as described in Part 4 of this Policy.
- Once your relationship or engagement with us has ended, we may still retain your information in our systems and records to, for example, ensure the adequate fulfilment of any surviving provisions in a terminated / expired contract or to comply with any record keeping obligation(s) imposed on us under applicable law.
- Furthermore, if, at any instance, your Personal Data has been collected solely on the basis of your consent and not in accordance with any other lawful basis of processing as recognized by applicable law, then such Personal Data shall be retained until the purpose for which it was processed is fulfilled, or until you revoke the consent previously granted to us – whichever may occur first.

6 To whom may we disclose your Personal Data?

- For the fulfilment the purposes set out in Part 4 above and in relying on the lawful bases for processing as permitted by applicable law, we may disclose and / or transfer your Personal Data to the following categories of third parties:
 - **Authorized agents and representatives** – where you have designated an authorised agent or representative to act on your behalf, we may disclose certain specified personal information to such authorised representatives, to the extent permitted and subject to the limitations prescribed by applicable law.
 - **Service providers and partner entities** – to the extent necessary to facilitate, deliver and / or improve our services or other interactions with you, we may disclose your Personal Data to third-party service providers and business partners.
 - **Third parties for legal, security or safety purposes** – we may disclose your Personal Data to professional advisors, law enforcement authorities and / or other government agencies and state instrumentalities to comply with legal and statutory requirements, to enforce and defend our legal and equitable rights, as well as to protect the rights, property and safety of our customers and associated third parties.
 - **Third parties in connection with a business transaction** – in the event Assurestack is acquired by or merged with any other company, we may share certain Personal Data with our advisors and / or potential transactional partners in the process of negotiating or completing the transaction.
 - **Other third parties with your consent** – in situations not covered by the above categories of personnel, we will seek your consent prior to disclosing your Personal Data to third parties.
- We may also transfer your Personal Data to entities located outside the United Kingdom for the purposes outlined in this Policy – where the Personal Data protection laws are likely to differ to that of the United Kingdom. In such instances, we will ensure that such cross-border transfers are

in accordance with and subject to the limitations imposed by applicable law and any other guidance or codes of practice issued by the Information Commissioner's Office (ICO).

7 Security

- We take reasonable effort to monitor and update our security standards in relation to your Personal Data, by implementing appropriate and commercially acceptable contractual, technical and organizational measures to help prevent the loss, misuse of and unauthorized access to your Personal Data.
- Despite our best efforts, however – we cannot guarantee the absolute security of such Personal Data, given that no means of data transmission or storage is 100% secure. Furthermore, when you access a link to a third-party site – whether accessible on or through our website or other platforms, you acknowledge that you will be leaving our website and, accordingly, that we cannot control, endorse or be held responsible for the security of any such third-party website.

8 Your rights

- As a data subject, you are vested with certain rights in respect of your Personal Data, subject to the specifications and restrictions imposed by applicable law. Such rights include:
 - **The right to be informed** – this enables you to be informed about the collection and use of your personal data by Assurestack.
 - **The right to request access to your Personal Data** – this enables you to request a copy of your Personal Data processed by us.
 - **The right to request the rectification of your Personal Data** – this enables you to request us to correct and / or complete any Personal Data that we hold in relation to you which may be demonstrably inaccurate and / or incomplete.
 - **The right to request the erasure of your Personal Data** – this enables you to request us to delete or remove your Personal Data to the extent specified and limited by applicable law.
 - **The right to restrict processing** – this enables you, in the limited circumstances set out under applicable law, to request the restriction of processing of your Personal Data. However, where such Personal Data is fundamental and indispensable to the provision of our services, we may be prevented from offering our services to you thereafter.
 - **The right to data portability** – this enables you, in circumstances identified by applicable law, to request that we move, copy or transfer your Personal Data to another designated data controller in a manner that is technically feasible.
 - **The right to withdraw consent** – where and to the extent certain Personal Data is processed solely on the basis of your consent, this enables you to withdraw your consent –

provided, however, that no such withdrawal shall affect the legality of any processing prior to such withdrawal.

- **The right to review an automated decision** – in the limited circumstances that a decision has been arrived at solely on the basis of automated processing, this enables you to request us to review such decision – subject to the conditions prescribed by applicable law.
- In exercising such rights, you must however ensure that your requests:
 - are communicated in writing to: info@assurestack.co.uk
 - set out the nature of the request and the respective right being exercised by you; and
 - fairly and reasonably identify the Personal Data in respect of which you wish to exercise such right.

We will respond to all data subject requests within the time frame(s) prescribed by applicable law. In doing so, we reserve the right to request and require you to provide additional information where, and to the extent, such information is necessary to process your request (for e.g., where you have failed or neglected to reasonably identify the Personal Data to which your request relates). We also reserve the right to decline processing any requests that are manifestly unfounded, fraudulent or otherwise not permitted by applicable law.

Where, and to the extent, you have any further queries, concerns or clarifications regarding the processing of your Personal Data by us, you may contact the Information Commissioner's Office in respect of the same.

9 Changes to the Policy

- We may update and revise this policy in accordance with the rapidly changing commercial, legal, regulatory and technological landscape. For such reason, we encourage you to visit our website and this Policy to ensure that you are aware of and updated on the manner and extent to which your Personal Data is processed by us.

This policy is effective from the 14th of May 2025.