



## Privacy Policy

X Cyber Group Ltd  
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### Introduction

1. X Cyber Group Ltd, its subsidiaries and affiliates ("X Cyber") genuinely care about privacy. We would like to explain to you how we process your personal data and comply with data privacy laws. This policy relates to all activities of X Cyber and will be updated from time to time. We hope it answers any questions you may have.
2. For some services we may provide you with a specially tailored privacy statement that relates to that processing, in which case you should also refer to that statement.

### Please tell me a little bit about X Cyber

3. X Cyber was formed by leading cyber experts from the UK government to provide advanced, professional, cyber-related risk assessment and mitigation services to businesses, governments and individuals. For example, one of our most popular services is providing personal cyber risk reports which seek to establish what information is 'out there' on the internet about our customers and whether it poses and risk to them or their interests.
4. In its investigations, X Cyber uses information, including personal data, provided by our customers as a starting point. We retrieve from the indexed, and unindexed, parts of the internet information that references the customer, analyse it and create a personalised risk report.
5. The report is intended to afford the customer the means to exercise their data privacy law rights, including rights to access, rectification, erasure, portability, the right to object and the right to not be subject to automated decision-making. Moreover, they may also have wider legal rights that they can use to protect themselves.
6. In conducting the investigation described above, X Cyber has a legitimate business interest in interacting with data sets that are not indexed by popular search engines but are nonetheless accessible via the internet and open to inspection using lawful means.
7. X Cyber may also make its data available to selected clients via an API where those clients have a legitimate business need to consume data. For example, regulated entities such as banks may wish to query the data in order to protect themselves and their clients from fraud, to uphold sanctions and meet

regulatory expectations. Client access to the data is subject to licensing conditions which ensure that they use the data lawfully and in accordance with data privacy laws.

### **What type of information does X Cyber have?**

8. X Cyber Group will process information you provide to us including:
- your name(s), address, telephone number(s) and email address(es).
  - billing and payment details.
  - additional information you choose to provide to X Cyber such as material to inform an investigation into your personal risk exposure, or in relation to another X Cyber service.
9. X Cyber may also hold information derived from the internet that relates to you, which it has processed as a consequence of searching internet material in the course of its legitimate business activity.

### **How we get the information and why we have it?**

10. Some of the personal information we process is provided to us **directly** by you for one of the following reasons:
- in order that X Cyber can undertake an investigation into the risks you face from exposure of information about you on the internet to criminal or other actors.
  - in order that X Cyber can provide you with other services or products.
  - to prevent and detect fraud or other illegal activity.
  - to meet X Cyber's legal obligations, defend claims and to meet requirements levied on X Cyber by regulators, the government or a court.
  - to meet standards expected within the industry and by X Cyber's policies.
11. We also receive personal information **indirectly**, from the following sources in the following scenarios:
- in the course of its investigations, X Cyber Group uses its technology and skill to retrieve from the internet information which may contain personal data. That data might relate directly to a customer who has consented to a search, or it might reference other people who might be associated with/connected to the customer. It may be necessary to process the latter in order to establish whether the association/connection is valid, incorrect or coincidental.
  - X Cyber may retrieve from the internet material which is necessary to help it to maintain, develop and provide its products and services.

## **On what lawful basis does X Cyber process personal data?**

12. Under the General Data Protection Regulation (GDPR), the **lawful bases** we rely on for processing this information are:

- **Your consent. Where you have granted us clear and unambiguous consent to process certain personal data that you have provided to us. You can withdraw your consent at any time. You can do this by contacting [privacy@xcybergroup.com](mailto:privacy@xcybergroup.com). Withdrawing consent does not mean that processing carried out before you withdraw consent becomes unlawful.**
- **We have a contractual obligation. For example, this may be used where it is necessary for X Cyber to fulfill a contractual obligation to you or to do work preparatory to a contractual obligation (e.g. prepare a proposal).**
- **We have a legal obligation. This arises where X Cyber needs to process your data in order to comply with a statutory or common law obligation. This might include an order from a court.**
- **There is a vital interest at stake. X Cyber investigations have in the past revealed real and imminent threats to the life of an individual (who might not be the data subject). In these circumstances, (and to the extent that the processing is not already lawful on another basis) X Cyber may process personal data where necessary to try and prevent or mitigate the harm.**
- **We have a legitimate interest. For example, X Cyber processes personal data obtained from the internet. This is necessary to achieve the legitimate interests of X Cyber and its customers. For example, in order to establish whether a customer's data has been placed at risk on the internet, X Cyber may need to retrieve data relating to a group or class of people and review it to look for information relating to the customer. When processing on this basis, X Cyber balances the expectations of individuals and the impact on their privacy flowing from retrieval of information from the internet against the legitimate interest of X Cyber and its customers.**

## **Does X Cyber process Special Category or Criminal Offence data?**

13. Special Category data is personal information that reveal or concerns:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- genetic data
- biometric data
- health information
- sex life
- sexual orientation

14. X Cyber generally avoids processing Special Category data unless it is absolutely necessary to do so and takes steps to avoid collecting such data when searching the Internet. However, from time-to-time Internet research will reveal Special Category information or allow meaningful inferences to be drawn concerning these personal attributes. Just because the data is publicly accessible on the Internet, it does not follow that we can process it without a specific justification.

15. X Cyber will only process special category data where a condition specified in the Data Protection Act applies. In summary, the relevant conditions are:

- the data subject has consented explicitly;
- the data subject has deliberately made the data public and we have obtained the data from a publicly accessible location; or,
- where there is a substantial public interest.

16. In terms of X Cyber's business activities, a substantial public interest means:

- preventing or detecting unlawful acts
- protecting the public against dishonesty
- regulatory requirements relating to unlawful acts/dishonesty
- preventing fraud
- making disclosures relating to terrorist financing or money laundering

17. Criminal Offence data relates to criminal convictions, allegations and proceedings. It is treated in the same way as Special Category data above. X Cyber does not collect and compile Criminal Offence data available on the Internet. However, when trying to protect clients from fraud, unlawful acts and terrorism we will look for criminal activity directed at the client and report it to the client on the basis set out above for Special Category data.

#### **What does X Cyber do with the information?**

18. We use the information that you have given us in order to:

- provide our cyber risk services to customers
- to maintain, develop and improve our services
- to communicate with you.

#### **Who may X Cyber share this information with?**

19. Acting in good faith, we share information outside of X Cyber if we judge that it is reasonably necessary to do so for one of the following reasons:

- to respond to a lawful request from government, the courts or law enforcement.
- to protect X Cyber and customer property
- to business partners, affiliates and subsidiaries for legitimate business reasons.

20. X Cyber may transfer your data outside of the EEA/EU. However, it will only do so where the transfer meets the standards required by data privacy law.

### **How does X Cyber store your information?**

21. Your information is securely stored at one of X Cyber's locations. We apply high security standards to your data, in terms of physically protecting it, using technical protections and controls and also through training of staff and placing restrictions on who may access it.

22. We keep personal data for the period necessary to fulfil the purposes described in this Privacy Policy, for legitimate business purposes such as record-keeping and where legally required/permitted to retain it.

### **What are your data protection rights?**

23. Under data protection law, you have rights including:

- **a right of access**  
You have the right to ask us for copies of your personal information.
- **a right to rectification**  
You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **a right to erasure**  
You have the right to ask us to erase your personal information in certain circumstances.
- **a right to restriction of processing**  
You have the right to ask us to restrict the processing of your information in certain circumstances.
- **a right to object to processing**  
You have the right to object to the processing of your personal data in certain circumstances.
- **a right to data portability**  
You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

24. Helpful information and guidance about your rights can be found on the Information Commissioner's Office (ICO) website: [www.ico.org.uk](http://www.ico.org.uk)

25. You do not have to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

26. Please contact us using the following details if you wish to make a request:

X Cyber Group Ltd

Building B5,  
Elmbridge Court,  
Gloucestershire,  
GL3 1JZ  
Telephone: 01452 527745  
Email: [privacy@xcybergroup.com](mailto:privacy@xcybergroup.com)

**How can I complain and to whom?**

27. You can also complain to the ICO if you are unhappy with how we have used your data. The ICO's address and telephone number:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Helpline number: 0303 123 1113

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