

CYBER PADLOCKING

Privacy Policy

Last updated: June 2026 | Version 1.0

1. Who We Are

This Privacy Policy explains how Cyber Padlocking ('we', 'us', 'our') collects, uses, stores, and protects your personal data when you visit www.cyberpadlocking.co.uk, contact us, or engage our services.

Data Controller: Michele Clarkson, trading as Cyber Padlocking

Registered address: Stirling, Scotland, United Kingdom

Contact: contact@cyberpadlocking.co.uk | 07857 378706

We are subject to the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. We are not currently required to register with the Information Commissioner's Office (ICO) as we do not process data at a scale that triggers mandatory registration, however we comply fully with UK GDPR obligations as a data controller.

2. What Personal Data We Collect

2.1 Data you provide directly

- Name, job title, and company name
- Email address and telephone number
- Information submitted via our contact and health check request forms
- Details about your business systems, security posture, and concerns (provided during consultancy engagements)
- Payment details (processed directly by our payment processors, we do not store card numbers)
- Newsletter subscription preferences

2.2 Data collected automatically

- IP address and browser type
- Pages visited, time on site, and referring URLs
- Device and operating system information
- Cookie identifiers and session data

2.3 Data collected through third parties

- Analytics data via Wix Analytics and Google Analytics / Google Search Console
 - Email engagement data (opens, clicks) via Mailchimp and Wix Email Marketing
 - Social media interaction data where you engage with our Facebook, LinkedIn, Instagram, X (Twitter), or YouTube profiles
 - Payment transaction records via Stripe, PayPal, and Gumroad
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3. Legal Basis for Processing

We only process your personal data where we have a lawful basis to do so under UK GDPR Article 6. The basis we rely on depends on the purpose:

Contractual necessity (Art. 6(1)(b)): Processing your enquiry, delivering consultancy services, issuing invoices, and fulfilling purchased training products.

Legitimate interests (Art. 6(1)(f)): Website analytics to improve our service; responding to enquiries; fraud prevention; maintaining service security.

Consent (Art. 6(1)(a)): Sending marketing emails and newsletters. You may withdraw consent at any time by clicking 'unsubscribe' in any email or by contacting us directly.

Legal obligation (Art. 6(1)(c)): Retaining financial records for HMRC compliance (currently 6 years).

4. How We Use Your Personal Data

- To respond to your enquiries and provide requested consultancy, training, or security services
 - To deliver the Cyber Health Check and produce your written security report
 - To process payments for services and digital products
 - To send transactional emails (booking confirmations, invoices, service updates)
 - To send our newsletter and marketing updates (where you have given consent)
 - To improve our website and understand how visitors use it
 - To comply with our legal and regulatory obligations
 - To protect the security and integrity of our business and your data
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5. Third-Party Data Processors

We use the following trusted third-party processors to deliver our services. Each operates under its own privacy policy and, where required, under a Data Processing Agreement with us.

Website & Analytics

Wix.com: Our primary website platform and built-in analytics. Data may be processed in the USA under Standard Contractual Clauses. See: [privacy.wix.com](https://www.wix.com/privacy)

Google Analytics / Search Console: Website traffic analysis. Data may be processed in the USA under Standard Contractual Clauses. See: policies.google.com/privacy

Email Marketing

Mailchimp (Intuit Inc.): Email marketing campaigns and newsletter distribution. Data processed in the USA under Standard Contractual Clauses. See: mailchimp.com/legal/privacy

Wix Email Marketing: Transactional and marketing emails sent via our Wix platform. See: [privacy.wix.com](https://www.wix.com/privacy)

Social Media Platforms

Facebook / Meta, LinkedIn, Instagram, X (Twitter), YouTube: If you interact with our social media profiles, those platforms collect data under their own privacy policies. We may receive aggregated audience data from these platforms. We recommend reviewing each platform's privacy policy independently.

Payments

Stripe: Payment processing for services. PCI-DSS compliant. We do not store your card details. See: stripe.com/gb/privacy

PayPal: Payment processing. We do not store your card or bank details. See: paypal.com/uk/legalhub/privacy-full

Gumroad: Digital product delivery and payment processing for training products. Data may be processed in the USA. See: gumroad.com/privacy

6. International Data Transfers

Some of our third-party processors are based outside the UK. Where personal data is transferred to countries not deemed adequate by the UK Government, we ensure appropriate safeguards are in place, including Standard Contractual Clauses (SCCs) approved by the ICO, or we rely on the processor's adherence to the UK International Data Transfer Agreement (IDTA) framework.

7. How Long We Keep Your Data

Enquiry and contact data: Up to 2 years from last contact, unless you become a client.

Client engagement data (reports, assessments, correspondence): Up to 6 years from the end of the engagement, in line with our contractual liability obligations.

Financial and payment records: 7 years from the end of the financial year in which the transaction occurred, as required by HMRC.

Newsletter subscribers: Until you unsubscribe or we cease newsletter operations.

Website analytics data: As configured within Wix and Google Analytics (typically 14 or 26 months for Google Analytics).

When data is no longer needed, we securely delete or anonymise it.

8. Cookies

Our website uses cookies to function properly and to understand how visitors use it. Cookies are small text files placed on your device.

Types of cookies we use

Strictly necessary: Required for the website to operate (e.g. session cookies, form security tokens). These cannot be disabled.

Analytics: Wix Analytics and Google Analytics cookies that help us understand visitor behaviour. These are only set with your consent.

Marketing: Social media tracking pixels (including Facebook Pixel) that allow us to measure the effectiveness of advertising. These are only set with your consent.

You can manage your cookie preferences at any time using the Cookie Preferences link in the footer of our website. You can also control cookies through your browser settings. Note that disabling cookies may affect website functionality.

9. Your Rights Under UK GDPR

You have the following rights regarding your personal data:

Right of access: You can request a copy of the personal data we hold about you (a Subject Access Request).

Right to rectification: You can ask us to correct inaccurate or incomplete data.

Right to erasure: You can ask us to delete your personal data where there is no compelling reason for us to continue processing it.

Right to restrict processing: You can ask us to limit how we use your data in certain circumstances.

Right to data portability: You can request your data in a structured, machine-readable format where processing is based on consent or contract.

Right to object: You can object to processing based on legitimate interests, including direct marketing.

Rights related to automated decision-making: We do not carry out solely automated decision-making or profiling that produces legal or similarly significant effects.

To exercise any of these rights, please contact us at contact@cyberpadlocking.co.uk. We will respond within one calendar month. We may need to verify your identity before processing your request.

If you are not satisfied with our response, you have the right to lodge a complaint with the Information Commissioner's Office (ICO):

- Website: ico.org.uk
 - Telephone: 0303 123 1113
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10. How We Protect Your Data

We take data security seriously, it is central to everything we do as a cybersecurity consultancy. Measures we take include:

- Encrypted communications (TLS/HTTPS) on all website forms and email
- Access controls limiting who can access client data
- Secure storage for client assessment reports and documentation
- Use of PCI-DSS compliant payment processors, we never handle raw card data
- Regular review of third-party processor security practices

In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify the ICO within 72 hours and affected individuals without undue delay, as required by UK GDPR.

11. Children's Data

Our services are directed at businesses and professional adults. We do not knowingly collect personal data from anyone under the age of 18. If you believe we have inadvertently collected data about a minor, please contact us immediately and we will delete it.

12. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, services, or legal requirements. When we make material changes, we will update the 'Last updated' date at the top of this document and, where appropriate, notify clients directly.

We encourage you to review this policy periodically. Continued use of our website or services after an update constitutes acceptance of the revised policy.

13. Contact Us

If you have any questions, concerns, or requests relating to this Privacy Policy or how we handle your personal data, please contact us:

Email: contact@cyberpadlocking.co.uk

Phone: 07857 378706

Website: www.cyberpadlocking.co.uk

Address: Stirling, Scotland, United Kingdom

We aim to acknowledge all data-related queries within 2 working days and to resolve them within one calendar month.

This document was prepared for Cyber Padlocking. It is intended to be accurate as of the date above but does not constitute legal advice. You may wish to have this reviewed by a qualified solicitor or data protection specialist if your processing activities change significantly.