

CAYTONS CYBER LIMITED DATA PROCESSING NOTICE

INTRODUCTION

1. In this Notice "us" and "we" means Caytons Cyber Limited and "you" means any party who reads this Notice.
2. This Notice only applies to Personal Data, including Sensitive Personal Data, of Data Subjects under the Data Protection Act 2018 (DPA) and the General Data Protection Regulation (EU) 2016/679 (GDPR).
3. This Notice is intended to comply with Section 2 and 3 of Part II of the DPA and Articles 12 to 14 of the GDPR.
4. This Notice is not advice and must not be relied upon as advice. We endeavour to keep the contents of this Notice correct and up to date but we do not accept any liability for mistakes or omissions. To the maximum extent allowable by law we do not accept any liability for damage or loss howsoever arising from this Notice.
5. This Notice does not waive rights of us or our clients or other third parties, including rights of privilege and confidentiality, and is subject to those rights and is also subject to obligations of our clients including those to the Court under Civil Procedure Rules Part 31 and those under the Code of Conduct of the Solicitors Regulation Authority.
6. We own the copyright and other intellectual property rights in this Notice. Reproduction and distribution of this Notice or any part of it is prohibited.

DATA CONTROLLER

7. The Information Commissioner's Office in the United Kingdom is our lead data protection supervisory authority. We are a Registered Data Controller in the United Kingdom. (ICO No. ZA216195).
See www.ico.org.uk/ESDWebPages/Entry/ZA216195
8. Our nominated representative for the purposes of the DPA is John Cayton.
9. We are a limited company incorporated in England (Companies House No. 09801397). Our main establishment is in the United Kingdom where decisions about purposes and means of processing are taken and implemented.

85 Gracechurch Street, London EC3V 0AA
T: +44 (0)20 7398 7616
E: info@caytonscyber.com
10. We act for clients including clients who are also Registered Data Controllers.

PROCESSING OF PERSONAL DATA

11. We process Personal Data fairly and lawfully under the DPA and GDPR in all aspects of our business as software developer and software consultant specialising in working for insurers, managing general agents, insurance brokers and firms of solicitors acting for those businesses.
12. We process Personal Data in the conduct of our business, including:
 - obtaining and collecting
 - holding and storing

- retrieving
- consulting
- using
- transmitting and disclosing

Personal Data, which includes:

- personal details
- family details
- lifestyle and social circumstances
- goods and services
- financial details
- business of the Data Subject whose Personal Data we are processing
- education and employment details
- physical or mental health details
- racial or ethnic origin
- political opinions
- religious or other beliefs
- sexual life
- trade union membership
- offences and alleged offences
- criminal proceedings, outcomes and sentences

13. There is no automated decision-making, including profiling, by us using Personal Data.
14. We only process Personal Data for the purposes for which the Personal Data was obtained.
15. The purposes of processing Personal Data include pursuing our legitimate interest, as Data Controller, as a software consultant and software developer.
16. We do not routinely transmit Personal Data outside of the European Economic Area. We do routinely carry out cross-border processing between the United Kingdom and Republic of Ireland. Processing by us in the United Kingdom substantially affects or is likely to substantially affect Data Subjects in the Republic of Ireland.

Acting For Clients

17. We obtain and receive on behalf of our clients Personal Data from Data Subjects and from many sources, including:
 - our clients
 - other representatives of our clients such as their insurance brokers and other professional advisers of clients
 - publically accessible sources such as HM Land Registry, Companies House and local authorities
 - factual witnesses contacted by our clients
 - expert witnesses instructed by our clients
 - parties in dispute with our clients and firms of solicitors acting for them including disclosure and inspection under Civil Procedure Rules Part 31
18. Some Personal Data is obtained by us under relevant statutory or contractual requirements.
19. We use Personal Data as an integral part of all aspects of our business when acting for clients, including our clients.
20. We transmit and disclose Personal Data to many parties, including our clients.
21. We hold and store Personal Data when our retainers with our clients have ended according to criteria agreed with our clients.

Other Aspects Of Our Business

22. We obtain Personal Data from Data Subjects and from many other sources, including:
- our employees
 - individuals applying to be our employees
 - visitors to our website
23. We use Personal Data as an integral part of all aspects of our practice, including:
- invitations to marketing events
 - the employment of our employees
 - creating content for our website
24. We transmit and disclose Personal Data to many parties, including:
- regulatory and law enforcement agencies
 - our accountants and other professional advisors
 - our insurers
 - our lenders
25. We hold and store Personal Data according to relevant contractual and statutory and regulatory requirements, including requirements of:
- HMRC
 - employment legislation

RIGHTS OF DATA SUBJECTS

26. Data Subjects have rights under, but subject to, the DPA and GDPR, including:
- right to be informed of material breaches of the DPA and GDPR
 - right to access to Personal Data
 - right to rectification of Personal Data
 - right to erasure of Personal Data
 - right to restrict processing of Personal Data
 - right to portability of Personal Data
 - right to object to Personal Data
 - right not to be subject to automated decision-making, including profiling
 - right to lodge a complaint with Information Commissioner's Office
27. Further information regarding rights of Data Subjects are on the website of the Information Commissioner's Office (www.ico.org)