VPS Group Privacy Policy & Notice

Please note that this privacy notice is updated from time to time. If you have any questions about this privacy notice, please contact <u>privacy@vpsgroup.com</u>

Privacy Notice

1. Important Information And Who We Are

Purpose of this privacy notice

Tyrion Security Bidco Limited ("**VPS**") has created this privacy notice in order to demonstrate our firm commitment to protecting and respecting your personal data (your"**information**"). The privacy and security of your information is very important to us. This privacy notice is intended to provide you with details about how any information that we collect from you, or that you provide to us, will be processed. It is therefore also intended to assist you in making informed decisions about your use of our website. Please read the following information carefully to understand our practices regarding your information and your personal data and how we will use and protect it in all of your interactions with VPS.

Who We Are

This privacy policy and notice applies to all visitors and third parties ("you" and "your"), of Tyrion Security Bidco Limited, company number 08994051, a limited company registered at Broadgate House, Broadway Business Park, Chadderton, Oldham OL9 9XA, and any members of our group including any subsidiaries as defined by section 1159 of the Companies Act 2006.

It is important that you read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing your information, so that you are fully aware of how and why we are using your information.

You can contact VPS at any time as follows:

- By emailing <u>privacy@vpgroup.com</u> for questions about this privacy notice or how we use your information

- By emailing tellmemore@vpsgroup.com for questions about our products and services

- By writing to us at: VPS Group Privacy Team, VPS Group, Broadgate House, Broadway Business Park, Chadderton, Oldham, OL9 9XA

Please also refer to section 13 below for further VPS contact details.

2. What Information Do We Collect?

Neither VPS nor WPEngine (our website publisher) ("**we**") will collect any information about individuals using this website or our services, except where it is specifically and knowingly provided by them, or as otherwise explained in this privacy notice.

We will collect information about you that you give us by filling in forms on our website (including the "contact us" form), requesting or obtaining a quote, or by corresponding with us (including about any products or services), whether by phone, email or otherwise. We will also collect information that you provide when you register to use our website, search for a product or services, report a problem with our website, give us feedback or contact us, or have any other interaction with us. Examples of the information that you might provide to us are as follows:

- Identity data including your first name and last name
- Contact data including your email address, telephone number
- Company data including your company name, job title and billing address
- Technical data including IP address, any login data, and other technology you might use to access this website
- Marketing and communications data including your preferences in receiving marketing from us and your communication preferences

There will also be some limited information that we may collect about you ourselves. On each of your visits to our website, we will automatically collect standard cookies – please refer to section 7 below of this privacy notice for further information about this.

3. Why We Need To Collect And Use Your Information

We need to collect your information to be able to respond to enquiries for our products or services, to deliver the services or products you request from us, and to fulfil any orders or contracts you place with us. For example, if you visit the VPS website and request a quote for security services, we need to use your name and email address to send you the quote you have requested. If you enquire about services or accept the delivery of services, you accept that VPS will store your details in our database for the purposes of fulfilling your enquiry and/or contract.

Any other processing of your personal data will either be with your consent (for example, we will only send communications about special offers to customers who tell us they want to receive this) or because we are legally required to process it.

4. How We Use Your Information

Your personal data collected through our websites will only be used for the purposes for which it was provided by you. We may share your information with other companies within the VPS Group, but only within the company that the information is gathered.

The information collected may also be used to:

- Send you the information you have requested and/or enable us to provide the products, goods or services that you have requested from us
- Set up contact details for you on our customer management database
- Fulfil the terms of any contract with you
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- Ensure that content from our website is presented in the most effective manner for you
- Provide information that may be useful to you, if you have consented to this, such as offers on products we have quoted on previously for you. We may contact you by email or phone
- Notify you of changes to our services
- Anticipate and resolve problems with any services supplied to you

• Send statements, invoices and payment reminders and collect payments should you contract with us

If you do not want us to use your data on this way, or if you want to stop receiving these messages from us, please refer to the "How to opt-out" paragraph at section 12 of this privacy notice.

We do not intend to transfer your information outside of the EU.

We may also use your information to administer our website and for our own internal operational and administrative purposes only, including troubleshooting, data analysis, testing, and as part of our efforts to keep our website safe and secure. We may also use your IP address to help diagnose problems with our server and to administer our website only.

5. How Long Do We Keep Your Information?

We will only retain your information for as long as reasonably necessary to fulfil the purpose for which it was collected, including the purposes of satisfying any legal, accounting or reporting requirements.

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.

We will retain your information for the following time periods:

- If we hold your information for the purposes of an order or contract you have placed with us, we will hold your information for as long as the contract is in place for the goods or services you ordered from us, and for a reasonable period after the contract terminates or expires, to ensure we can still answer any queries you might have about the services you had received, and to satisfy any legal, accounting or reporting requirements
- If we hold your information for the purposes of a quote or survey we have provided, but you did not ever place an order with us, we will hold your information for a reasonable period after providing the quote or survey (in case you do decide to place an order with us)
- In addition, if we hold your information because you have told us you are happy to receive communications from VPS about our products and services, then we will hold this for a reasonable period of time, and until you tell us you no longer want to receive those communications (as you can unsubscribe at any time)
- If there is any information we hold about you due to a legal requirement, we will hold it for as long as we are legally required to do so

In some circumstances, we might anonymise your information so that it can no longer be associated with you, including for research or statistical purposes, in which case we may use this information without further notice to you.

You have various rights in relation to the information we hold about you, including rights to access your information and rights to have it deleted from our systems. Please refer to section 8 for more information about this.

6. Who We Share Your Information With

We take your privacy seriously, and we will only share your data with third parties in limited circumstances. We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

By using our website, you agree that we have the right to share your personal information with:

- Carefully selected suppliers and sub-contractors who are fully committed to protecting your data (for the purposes of performing any contract we enter into with you). We do sometimes use third party suppliers to help us deliver services and fulfil customer orders
- External support services (including any IT service providers) for the purposes of providing administrative and technical support to VPS, including with our website, to ensure we can deliver your order and fulfil our contract with you
- Professional advisers including auditors and insurers
- Any member of our group, which means our subsidiaries, parent company, ultimate holding company and its subsidiaries for the purposes of delivering your order, fulfilling our contract with you, helping us identify services and products that might be of interest to you and conducting customer research
- Where we are under a duty to do so in order to comply with any legal or regulatory obligation, or to protect the rights, property or safety of VPS and our customers. This includes exchanging information with other companies and organisations where we are legally required to do so, for example for the purposes of fraud protection and credit risk reduction

7. Cookies

Please see our separate Cookie Policy which is accessible through a link on our website.

8. Your rights in relation to your information

Your personal data is also protected by the Data Protection Act 2018, the General Data Protection Regulation (and any local other legislation and any legislation or regulations that might supersede this) (**GDPR**). VPS takes its obligations under the GDPR seriously, including the requirement that any personal data we use and process must be collected for a specified and legitimate purpose, must be accurate and kept up to date, and we must ensure the security of your personal data is maintained, including against accidental loss and unauthorised access.

You also have various rights under GDPR in relation to your personal data, including the following:

- You have rights to access your information (commonly known as a 'subject access request'). This enables you to receive a copy of the personal data we hold about you and to check we are lawfully processing it
- You have the right to request the correction of the personal data we hold about you
- You have the right to request the erasure of the personal data in certain circumstances (where there is no good reason for us to continue processing it)
- You have the right to object to the processing of your personal data by VPS where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data

- You have the right to data portability, which allows you to obtain and reuse your personal data for your own purposes across different services
- You have the right to withdraw your consent to VPS using your personal data
- You have the right to request the restriction of the processing of your personal data
- You also have the right to make a complaint with the data protection authority in the UK (the Information Commissioner's Office <u>https://ico.org.uk/</u>). We would, however, appreciate the chance to deal with your concerns before you contact the ICO, so please contact us in the first instance using the details in this privacy notice

If you want to exercise any of these rights, please contact us at <u>privacy@vpsgroup.com</u>. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than one month if your request is particularly complex or you have made a number of requests. In this case, we will notify you of this and will keep you updated about our progress.

9. Changes To This Notice

We keep our privacy notice under regular review. You should regularly check this notice for updates.

This privacy notice was last updated on 16th May 2025.

10. Your Consent

By using this website, you consent to our collection and use of your information as described in this privacy notice.

11. How We Maintain The Security Of Your Information

This website has robust security measures in place to try to prevent the loss, misuse and alteration of the information under our control.

We treat all personal data that we hold with the utmost care and security. Subject to the terms of this notice and any contract that we have in place with you, any details you provide to us or that we store will remain confidential.

The data that we collect from you will be stored on our secure servers. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential.

Unfortunately, the transmission of information via the internet can never be guaranteed to be completely secure. While we will do our best to protect your personal data once we receive it on our website and servers, we cannot guarantee the security of your data when it is transmitted to our website over the internet, as there are certain matters that will be outside of our control (for example, any viruses that might exist on your computer). The initial transmission of your personal data is therefore at your own risk. Once your data has been received on our platforms, however, we take ownership for its security as set out in this privacy notice.

12. How To Opt-Out

You have the right at any time to ask us not to process your personal data. We do need to process certain personal data to be able to fulfil any order or contract that you place with VPS (including your name, email address, phone number and address), so please be aware that any opt-out in relation to this data will have an impact on our ability to deliver our obligations to you.

From time to time, we do also send customers information about our products, services and special offers. We only send this to customers who have specifically given their consent to receive these communications, at the point they submit an enquiry on our website. You can optout of receiving these communications at any time by emailing tellmemore@vpsgroup.com or using the "unsubscribe" link at the bottom of any emails you receive from us.

Our website may also, 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, please note that these websites have their own privacy policies, and we do not accept any responsibility or liability for these policies. Please check these carefully before you submit any personal data to those websites.

13. Contacting VPS

You can contact us using the following contact details:

If you have any general queries about products or services or to inform us of any changes or updates to your information	Please contact us at <u>tellmemore@</u> <u>vpsgroup.com</u>
If you have any questions about this privacy notice or how we use your personal data	Please contact us at <u>privacy@vpsgroup.</u> <u>com</u>
VPS Site Security Limited has a Data Protec- tion Officer, who is responsible for the security of the personal data processed by that legal entity only. For more information about VPS Site Security, please refer to this section of our website: https://www.vpsgroup.com/services/ site—security.	us at Data Protection Officer, VPS Site Security Limited, VPS Group, Broadgate House, Broadway Business Park,