

PRIVACY STATEMENT

INTRODUCTION

This Privacy Statement applies between Acubed.IT and users of this website, as well as our clients and employees. Acubed.IT is committed to safeguarding your privacy. This statement outlines how we collect, use, and protect any data provided by you or collected by us in relation to your interaction with our website, our services, and our business operations.

Please read this Privacy Statement carefully.

DEFINITIONS AND INTERPRETATION

In this Privacy Statement, the following definitions are used:

1. **Data:** collectively all information that you submit to Acubed.IT via the website or otherwise provide as part of our business relationship. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws.
2. **Data Protection Laws:** any applicable law relating to the processing of personal data, including but not limited to the GDPR, and any national implementing laws, and supplementary laws, regulations and secondary legislation.
3. **We or Us:** Acubed.IT
4. **User or you:** Any third party that accesses the website and is not either (i) employed by Acubed.IT and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to Acubed.IT and accessing the website in connection with the provision of such services; and
5. **Website:** the website that you're currently using, <https://www.acubed.it>, and any sub-domains of this site unless expressly excluded by their own terms and conditions.

In this Privacy Statement, unless the context requires a different interpretation:

- a) the singular includes the plural and vice versa.
- b) references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this Privacy Statement.
- c) a reference to a person includes firms, companies, government entities, trusts and partnerships.
- d) 'including' is understood to mean 'including without limitation'.
- e) reference to any statutory provision includes any modification or amendment to it.
- f) the headings and sub-headings do not form part of this Privacy Statement.

SCOPE OF THIS PRIVACY STATEMENT

This Privacy Statement applies only to the actions of Acubed.IT and users with respect to this website. It does not extend to any websites that can be accessed from this website including, but not limited to, any links we may provide to social media website.

For purposes of the applicable Data Protection Laws, Acubed.IT is the 'data controller'. This means that Acubed.IT determines the purposes for which, and the way, your data is processed.

HOW WE COLLECT DATA

We collect data in the following ways:

- a) data is given to us by you; and
- b) data is collected automatically.

DATA THAT IS GIVEN TO US BY YOU

Acubed.IT will collect your data in number of ways, for example:

- a) when you contact us through the website, by telephone, post, e-mail or through any other means, in each case, in accordance with this Privacy Statement.
- b) When you enter a business relationship with us as a client.
- c) When you apply for employment with us, provide your CV, or during onboarding process.

DATA THAT IS COLLECTED AUTOMATICALLY

To the extent that you access the website, we will collect your data automatically, for example:

- a) we automatically collect some information about your visit to the website, such as your IP address, the date, times and frequency with which you access the website and the way you use and interact with its content. This information helps us to make improvements to website content and navigation.

CATEGORIES OF DATA COLLECTED

Depending on your interaction with us, we may collect:

- Contact Information (e.g., name, email address, telephone number)
- Professional Information (e.g., job title, employer, sector interests)
- Technical Data (e.g., IP address, device information, browsing patterns)
- Communication Data (e.g., queries or messages you send us)
- Employment Data (e.g., CVs, references, background check information)
- Client and Contractual Data (e.g., billing details, project information)

PURPOSE AND LEGAL BASES FOR PROCESSING DATA

We process your data for the following purposes, based on these lawful bases:

PURPOSE	LAWFUL BASIS
Responding to enquiries submitted via the Website	Legitimate Interest
Providing and managing our services to clients	Contractual Necessity
Managing employment relationships	Contractual Necessity
Improving website functionality and user experience	Legitimate Interest
Marketing Communications (if opted-in)	Consent
Fulfilling legal obligations, e.g. tax, regulatory compliance	Legal Obligation
Ensuring security and fraud prevention	Contractual Necessity

KEEPING DATA SECURE

We will use technical and organisational measures to safeguard your data, for example:

- a) access to your data is controlled via secure authentication and role-based permissions.
- b) we store your data on secure servers.
- c) regular security reviews and breach detection protocols are in place.

If you suspect any misuse or loss or unauthorised access to your data, please let us know immediately by contacting us via enquiries@acubed.it.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identify theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

DATA SHARING

We may share your data with:

- IT infrastructure providers (e.g., Microsoft 365, HubSpot, AWS)
- Legal, HR, accounting, or compliance advisors
- Recruitment and background screening providers
- Payment and billing platforms
- Regulatory authorities if required by law

All third-party service providers are bound by strict contractual obligations to protect your Data and process it only in accordance with our instructions.

INTERNATIONAL DATA TRANSFER

Where your data is transferred outside the UK, we ensure it is protected by:

- Standard Contractual Clauses (SCCs) approved by the UK/EU authorities.
- Adequacy decisions for certain jurisdictions.

You may request further information on safeguards by contacting enquiries@acubed.it.

DATA RETENTION

Unless a longer retention period is required or permitted by law, we will only hold your data on our systems for the period necessary to fulfil the purposes outlined in this Privacy Statement, including for satisfying any legal, accounting, or reporting requirements. Typical retention periods include:

Data Type	Retention Period
Website Enquiries	12 months
Client Data	6 years after the end of contract
Employment Data	6 years after termination of employment
CVs (if not hired)	6 months
Technical/Analytics Data	24 months

Even if we delete your data, it may persist on backup or archival media for legal, tax or regulatory purposes.

YOUR RIGHTS

You have the following rights in relation to your data:

- Rights to Access** - the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is 'manifestly unfounded or excessive'. Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.
- Right to Correct** - the right to have your data rectified if it is inaccurate or incomplete.
- Right to Erase** - the right to request that we delete or remove your data from our systems.
- Right to Restrict our use of your data** - the right to 'block' us from using your data or limit the way in which we can use it.
- Right to Data Portability** - the right to request that we move, copy or transfer your data.

- f) **Right to Object** - the right to object to our use of your data including where we use it for our legitimate interests.

To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your data (where consent is our legal basis for processing your data), please contact us via this email address: enquiries@acubed.it.

If you are not satisfied with the way a complaint you make in relation to your data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at <https://ico.org.uk/>.

It is important that the data we hold about you is accurate and current. Please keep us informed if your data changes during the period for which we hold it.

Please note that the extent to which you can exercise these rights may vary depending on the nature of the data we hold about you and the legal basis on which we process it. In some cases, we may be entitled to refuse a request—for example, where the data must be retained for legal or regulatory purposes, or where exemptions apply under data protection laws.

LINK TO OTHER WEBSITES

This website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This Privacy Statement does not extend to your use of such websites. You are advised to read the Privacy Statement of other websites prior to using them.

BUSINESS TRANSFERS

Acubed.IT, may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of Acubed.IT. Data provided by users will, where it is relevant to any part of our business transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Statement, be permitted to use the data for the purposes for which it was originally supplied to us.

We may also disclose data to a prospective purchaser of our business or any part of it.

In the above instances, we will take steps with the aim of ensuring your privacy is protected.

GENERAL

You may not transfer any of your rights under this Privacy Statement to any other person. We may transfer our rights under this Privacy Statement where we reasonably believe your rights will not be affected.

If any court or competent authority finds that any provision of this Privacy Statement (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision

will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this Privacy Statement will not be affected.

Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

This agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

CHANGES TO THIS PRIVACY STATEMENT

Acubed.IT reserves the right to change this Privacy Statement as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the website, and you are deemed to have accepted the terms of the Privacy Statement on your first use of the website following the alterations.

You may contact Acubed.IT by email at enquiries@acubed.it.

ATTRIBUTION

This Privacy Statement was created using a document from Rocket Lawyer (<https://www.rocketlawyer.com/gb/en>).

This Privacy Statement was created in February 2025.