



Privacy Policy

X Cyber Group Ltd
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Email: privacy@xcybergroup.com

Introduction

1. X Cyber Group Ltd ("X Cyber") exists to help businesses, individuals and governments protect themselves, their staff, their customers and their data from cyber and real-world threats. Therefore, data security and privacy are genuinely important to X Cyber. 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 experts from the UK government to provide businesses, governments and individuals with data and services that help protect them from online and real-world risks.

4. X Cyber has developed capabilities which enable it, and its customers, to access and understand large parts of the Internet that are not indexed by commercial search engines. In many cases, clients' data can be found on this part of the Internet and is therefore available for exploitation by criminals and State actors.

5. Unlike web search engines, X Cyber's capabilities and research focus on technical associations between technical/digital identifiers. As such, the data it processes does not contain media files and likely contains far less personal information than web search engines.

6. The capabilities are used to help clients in a number of ways. For example:

- a) the data can be interrogated to provide reports on risk exposure. This can be done for individuals or entire groups of companies;
- b) sophisticated clients and/or their cyber security professionals can use the data to provide real time alerts of compromises or nascent attacks;
- c) individual users can be alerted to compromises of their email addresses, usernames, passwords and phone numbers;
- d) X Cyber can triage job applications to flag inauthentic or anomalous applications for further investigation;
- e) X Cyber can use data to track assets and IP on your behalf; and

- f) law enforcement agencies can use the data to identify criminals (cyber and real-world) using false personas, patterns of criminal activity and/or locate missing persons.

7. Paragraph 12 below sets out the lawful bases upon which X Cyber relies to provide its products and services.

What type of information does X Cyber have?

8. X Cyber 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/business 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 do we get the information and why do 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 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. Withdrawing consent does not mean that processing carried out before you withdraw consent becomes unlawful.
- 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).
- 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.
- a vital interest is 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 clients. For example, in order to establish whether a client'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 client. 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 clients.

Does X Cyber process special category or criminal offence data?

13. Special category data is personal information that reveals 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 avoids indexing and processing special category data. Moreover, the systems are designed so that special category characteristics are not searchable fields. However, from time-to-time Internet research will reveal data that is potentially special category information, or that which allows a user to infer such characteristics.

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; and
- to communicate with you.

Who may X Cyber share this information with?

19. Acting in good faith, we only 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; and,
- to business partners, affiliates and subsidiaries for legitimate business reasons.

20. X Cyber may transfer your data outside of the EEA/EU, although this is not a common occurrence. 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 protection and controls and also through training of staff and placing restrictions on who may access it.

How long does X Cyber retain your information?

22. We keep personal data only for the period reasonably necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, accounting, tax or reporting requirements. X Cyber must keep basic information about clients for up to six (6) years after they cease to be customers. Data may be retained for a longer period in the event of a complaint or where a prospect of litigation is reasonably believed to exist, to allow the matter to be resolved.

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

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
Email: privacy@xcybergroup.com

How can I complain and to whom?

27. If you have a query or complaint about X Cyber's data processing please contact us at the email address privacy@xcybergroup.com

28. You can also complain to the ICO if you are unhappy with how we have used your data. ICO offer live chat via their website: <https://ico.org.uk/make-a-complaint/>. The ICO's address and telephone number are:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: +44 (0)303 123 1113

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