



PRIVACY POLICY

BACKGROUND:

THE CYBER RESILIENCE CENTRE FOR WALES LIMITED, a company incorporated in England and Wales, (Registered No. 13409188) with its Registered Office at South Wales Police, Police Hq, Cowbridge Road, Bridgend, United Kingdom, CF31 3SU (“**we/us/our**”) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, <https://www.wcrcentre.co.uk> (“**Our Site**”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is requested to access our website and / or sign up for membership.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

[“Account”	means an account required to access and/or use certain areas and features of Our Site;]
“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 14, below; and
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
“Student Services”	means the provision of services whereby we, National CRC Group Limited (Registered No. 13027672) and each of the other eight Cyber Resilience Centres (“CRC”s) across England and Wales work closely with local universities to recruit students, who work alongside senior cyber security practitioners to deliver high-quality and tailored cyber resilience services to organisations.

2. **Information About Us**

Our Site is owned and operated by us.

Data Protection Officer: Paul Hall

Email address: enquiries@wcrcentre.co.uk

3. **What Does This Policy Cover?**

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

4. **What Is Personal Data?**

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. **What Are My Rights?**

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in

many cases.

- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 15.

6. What Data Do You Collect and How?

Depending upon your use of Our Site, We collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. Please also see Part 14 for more information about our use of Cookies and similar technologies our Cookie Policy. We do not collect any 'special category' or 'sensitive' personal data or personal data relating to children or data relating to criminal convictions and/or offences.

Data Collected	How We Collect the Data
Identity Information including name, title & role.	For membership and subscription services, contacting us with general enquiries and customised marketing, by the data subject completing an online form. The data is automatically held in Our CRM system. The data subject's name is automatically collected by Hubspot and is used for sending correspondence. For delivery of Student Services, a referral of the data subject's details will be shared with National CRC Group Limited via our CRM to the their CRM. The data is automatically held in their CRM system. For more information on how and why we share certain personal data with third parties please see section 10.
Contact information including address, email, & phone number.	For membership and subscription services, contacting us with general enquiries and customised marketing, by the data subject completing an online form. The data is automatically held in Our CRM system. The data subject's name is automatically collected by Hubspot and is used for sending correspondence.

	<p>For delivery of Student Services, a referral of the data subject's details will be shared with National CRC Group Limited (via our CRM to the their CRM. The data is automatically held in their CRM system.</p> <p>For more information on how and why we share certain personal data with third parties please see section 10.</p>
Business information including business name, job title & profession.	<p>For membership and subscription services, contacting us with general enquiries and customised marketing, by the data subject completing an online form. The data is automatically held in Our CRM system.</p> <p>For delivery of Student Services, a referral of the data subject's details will be shared with National CRC Group Limited via our CRM to the their CRM. The data is automatically held in their CRM system.</p>
Profile information including preferences & interests.	Automated input upon accessing Our Site. The data is automatically held in Our CRM system.
Technical information including Web browsing data (IP address; Device name; Device ID; Timezone; Country).	Automated input upon accessing Our Site. The data is automatically held in Our CRM system.
Data from third parties including e.g. technical information, contact information & profile information.	The data is automatically collected and held in Our CRM system. For more information on how and why we share certain personal data with third parties please see section 10.

7. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Registering you on Our Site including membership creation.	Identity information, Name; Role; Contact Information(address, email, phone number); Business Information;	<p>The processing is conducted for the purposes of:</p> <ul style="list-style-type: none"> • Delivery of Student Services, a referral with consent will be made by us and shared with National CRC Group Limited for the purposes of engagement with the data subject for the purposes of engagement

		<p>for cyber resilience services.</p> <ul style="list-style-type: none"> • The management of memberships on Our Site. • The marketing of the Student Services and other services made available through Our Site. Certain data including personal data may be transferred to another CRC, if National CRC Limited deem that another CRC should provide the required services including Student Services. • Responding to general correspondence and any complaints.
Providing and managing your access to Our Site.	Technical information, Web browsing data (IP address; Device name; Device ID; Timezone; Country).	As Above.
Personalising and tailoring your experience on Our Site.	Technical information Web browsing data (IP address; Device name; Device ID; Timezone; Country); Profile information.	As Above.
Administering Our Site.	Technical information Web browsing data (IP address; Device name; Device ID; Timezone; Country).	As Above.
Administering our business.	Technical information Web browsing data (IP address; Device name; Device ID; Timezone; Country).	As Above.
Supplying our products and /or services to you.	Identity information, Name; Role; Contact details (address, email, phone number); Data supplied from third parties.	As Above.
Communicating with you.	Identity information, Name; Role; Contact details (address, email, phone number); Data supplied from third parties;	As Above.

	Profile information.	
Supplying you with information by email AND/OR post that you have opted-in-to (you may opt-out at any time by	Identity information, Name; Role; Contact details (address, email, phone number); Data supplied from third parties; Profile information.	As Above.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email **AND/OR** telephone **AND/OR** text message **AND/OR** post with information, news, and offers on our products and/or services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

Third Parties (including but not limited to YouTube (Google LLC), LinkedIn (Microsoft Corporation and Twitter (Twitter Inc.) whose content appears on Our Site may use third-party Cookies, as detailed below in Part 14. Please refer to Part 14 for more information on controlling cookies. Please note that we do not control the activities of such third parties, nor the data that they collect and use themselves, and we advise you to check the privacy policies of any such third parties.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 15.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Identity Information Name, Role, Contact details (address, email, phone number).	The processing shall commence upon engagement and shall continue for the duration of any agreement, subject to any permitted contract extension or termination, whereupon the data return/deletion provisions shall apply.

	Data collected on Our Site in relation to general correspondence, registering interest in relation to our membership services, Student Services, any other services we make available on Our Site and marketing shall be held for a period of 2 years.
Contact information including address, email address & telephone number.	As above.
Business information including business name, job title & profession.	As above.
Profile information including preferences and interests, username and password.	As above.
Technical information including Web browsing data (IP address; Device name; Device ID; Timezone; Country).	As above.

9. How and Where Do You Store or Transfer My Personal Data?

We will store some of your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

Some of your personal data will be stored within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfers of personal data to the EEA from the UK are permitted without additional safeguards.

We store some personal data in countries outside of the UK. These are known as “third countries”. We will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

We will use specific approved contracts which ensure the same levels of personal data protection that apply under the Data Protection Legislation. For further information, please refer to the [Information Commissioner’s Office](#).

Please contact us using the details below in Part 15 for further information about the particular data protection safeguards by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- implementing procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner’s Office where we are legally required to do so;

10. Do You Share My Personal Data?

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may share your personal data with other companies in our group for company management purposes. This includes subsidiaries.

We may sometimes contract with the following third parties to supply certain products and/or services:

Recipient	Activity Carried Out	Sector	Location
National CRC Group Limited (Company No. 13027672)	Promotional, partnership and engagement activity in the provision of certain services including the Student Services.	Cyber Security	England
HubSpot	Customer Relationship Management (CRM) services, used to manage interactions with customers, build customer relationships and streamline processes to improve customer service.	Customer Relationship Management services marketing automation and email marketing services	The United States of America UK, European Economic Area, New Zealand, and other third countries outwith the UK and European Economic Area
Cake + Ice Cream Ltd (Company No. 12994982)	Providing digital marketing, social media management.	marketing and digital media management	England
Xero (UK) Limited (Company No.06071722)	Invoicing services provided in relation to the services identified on Our Site	Accounting and invoicing services	UK, European Economic Area, New Zealand, the United States of America and other third countries outwith the UK and European Economic Area

If any of your personal data is shared with a third party, as described above, We will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 9.

If any personal data is transferred outside of the UK, We will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 9.

11. **How Can I Control My Personal Data?**

11.1 In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Site, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and at the point of providing your details).

11.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

12. **Can I Withhold Information?**

You may access certain areas of Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

You may restrict Our use of Cookies. For more information, see Part 14 our Cookie Policy

13. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 28 calendar days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

14. How Do You Use Cookies?

Our Site places and accesses certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve our products and/or services. By using Our Site you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us. In addition, Our Site uses analytics services provided by Google LLC, which also use Cookies. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling us to better understand how people use Our Site. For more details, please refer to our Cookie Policy.

15. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: enquiries@wrcxentre.co.uk

Postal Address: The Cyber Resilience Centre for Wales, South Wales Police HQ, Cowbridge Road, Bridgend, CF31 3NR.

16. Changes to this Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 1st October 2024.