

## **Seven20 Data Privacy Policy**

### **1. Important information**

This Data Privacy Policy explains how Seven20 collects, uses, stores, shares and protects personal data in connection with its website, services, communications and business operations.

It is intended to provide transparent information to website users, customers, prospects, suppliers, candidates, and other individuals whose personal data may be processed by Seven20.

This policy should be read alongside any specific privacy notice, cookie notice, fair processing notice, contract terms, or service-specific notice that may apply in your particular circumstances.

### **2. Who Seven20 is**

Seven20 is the controller of personal data processed in connection with its website and related business activities where Seven20 determines the purposes and means of processing.

Questions about this policy or about Seven20's privacy practices should be directed to Seven20's designated Data Protection Manager using the contact details published by the organisation and at the end of this policy.

Seven20 keeps this policy under regular review and may update it from time to time to reflect legal, operational, technical, or organisational changes.

### **3. Representation in the UK and EEA**

Seven20 confirms that representation arrangements are in place in both the United Kingdom and the European Economic Area for processing activities where such representation is required under applicable data protection law.

Details of the UK representative and the EEA representative, including contact points for supervisory authorities and data subjects, are included in any published privacy notice(s), website contact section, or related compliance documentation maintained by Seven20.

### **4. What personal data Seven20 collects**

Depending on the nature of the relationship with the individual, Seven20 may collect and process categories of personal data including identity data, contact data, financial data, transaction data, technical data, profile data, usage data, marketing and communications data, and other information voluntarily submitted through forms, enquiries, recruitment activity, account creation, or service use.

Seven20 may also create or use aggregated and anonymised information for statistical, analytical, service improvement, capacity planning, security monitoring, or reporting purposes where that information does not identify an individual.

Where special category data or criminal offence data is processed for recruitment purposes, Seven20 will only do so where a lawful condition or legitimate interest exists and with additional safeguards appropriate to the sensitivity and risk of that processing.

## **5. How personal data is collected**

Personal data may be collected directly from individuals when they contact Seven20, complete forms, create accounts, use services, request information, subscribe to updates, purchase services, apply for roles, or otherwise interact with the organisation.

Seven20 may also collect technical and usage information automatically through website technologies such as cookies, logs, analytics tools, security monitoring tools and similar technologies, subject to applicable transparency and consent requirements.

In addition, Seven20 may receive personal data from third parties such as analytics providers, advertising networks, search information providers, payment providers, technical service providers, public registers, recruitment partners, business partners, or other lawful sources.

## **6. How Seven20 uses personal data**

Seven20 will only use personal data where there is a lawful basis to do so. Depending on the circumstances, this may include performance of a contract, compliance with a legal obligation, legitimate interests, consent, or another lawful basis permitted by applicable law.

Personal data may be used to provide services, manage accounts, respond to enquiries, administer contracts, process payments, deliver support, improve website functionality, maintain security, prevent fraud, analyse service performance, manage recruitment, send service communications, comply with legal obligations, and, where permitted, send marketing communications.

Where Seven20 relies on legitimate interests, it will consider the impact on individuals and will not rely on that basis where rights and freedoms override the relevant business interests. A Legitimate Interest Assessment would occur.

Where consent is required, such as for certain cookies or certain direct marketing activities, Seven20 will seek that consent and provide a means to withdraw it.

## **7. Marketing and cookies**

Seven20 may use personal data to send information about services, updates, events or other content that may be relevant to the recipient, subject to applicable electronic marketing rules and opt-out rights.

Individuals can opt out of marketing communications at any time using unsubscribe options or by contacting Seven20 directly.

Seven20's website may use cookies and similar technologies for functionality, analytics, security and, where relevant, preference or marketing purposes. Where required by law, cookie choices will be managed through an appropriate consent mechanism and supported by a separate cookie notice or cookie settings tool.

## **8. Disclosure of personal data**

Seven20 may share personal data with employees, contractors, professional advisers, auditors, insurers, technology and hosting providers, analytics providers, payment providers, recruitment or communications providers, regulators, law enforcement bodies, and other third parties where disclosure is necessary, proportionate and lawful.

Where third-party service providers process personal data on Seven20's behalf, Seven20 will require them to act only on documented instructions, apply appropriate confidentiality and security controls, and meet contractual data protection obligations.

Personal data may also be disclosed in connection with a business sale, merger, acquisition, restructure, investment transaction, legal claim, or regulatory requirement where such disclosure is lawful and necessary.

## **9. International transfers**

Where personal data is transferred outside the UK or outside the EEA, Seven20 will ensure that an appropriate safeguard is in place, such as an adequacy decision, approved contractual clauses, binding corporate rules, or another lawful transfer mechanism recognised under applicable law.

Seven20 will assess international transfers where required and implement supplementary measures where necessary to ensure that transferred personal data continues to receive a level of protection essentially equivalent to that required under applicable data protection law.

## **10. Data security and technical measures**

Seven20 applies appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or inappropriate forms of processing.

These measures include governance controls, role-based access controls, authentication measures, least-privilege access, secure configuration, patching, endpoint protection, logging and monitoring, encryption where appropriate, secure backup, resilience arrangements, incident management, supplier assurance, and confidentiality obligations.

As part of its security framework, Seven20 references ISO/IEC 27001:2022 aligned controls as technical and organisational measures supporting the protection of personal data, including controls relating to information security policies, legal and regulatory compliance, privacy and protection of personally identifiable information, information classification, deletion, masking, and leakage prevention.

### **11. Data retention**

Seven20 will retain personal data only for as long as necessary for the purposes for which it was collected, including to meet legal, regulatory, tax, accounting, contractual, security and dispute-management requirements.

Retention periods may vary depending on the type of data, the purpose of processing, the sensitivity of the information, and the applicable legal or operational obligations. Where data is no longer required, it will be securely deleted, anonymised or destroyed.

### **12. Data subject rights**

Subject to applicable law, individuals may have rights to request access to their personal data, rectification, erasure, restriction, objection, portability, and withdrawal of consent where consent is relied upon. Individuals may also have rights relating to automated decision-making, where relevant.

Seven20 will maintain procedures to verify identity, assess requests, and respond within applicable legal timescales. Requests may be refused or limited only where permitted by law.

Individuals also have the right to raise concerns with Seven20 and to lodge a complaint with the ICO or another competent supervisory authority where they believe their personal data has been processed unlawfully.

### **13. Children and third-party websites**

Seven20's website is not intended for children unless expressly stated otherwise, and Seven20 does not knowingly collect personal data from children through the website without appropriate legal basis and safeguards.

The website may contain links to third-party websites, plug-ins or applications. Seven20 is not responsible for the privacy practices of third parties, and users should review the relevant privacy notices when leaving Seven20's environment.

#### **14. Personal data breaches**

Seven20 maintains procedures for identifying, reporting, assessing, containing and investigating suspected or actual personal data breaches. Where required by law, Seven20 will notify the relevant supervisory authority and affected individuals within the applicable timescales.

#### **15. Contact and review**

Questions about this policy, privacy rights requests, and privacy concerns should be directed to Seven20 using the contact information published in its current privacy notice or website contact details.

This policy shall be reviewed at least annually and earlier where there are material changes to law, regulation, business operations, systems, vendors, international transfers, or risk exposure.

Seven20 Data Protection Officer – [dpo@seven20.io](mailto:dpo@seven20.io)

#### **UK Data Subjects may raise concerns to:**

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

#### **EEA Data Subjects may raise concerns to:**

Data Protection Commission  
21 Fitzwilliam Square South  
Dublin 2  
D02 RD28