

Document owner: TPMG Group Services Ltd / Shared Services Hub

Policy owner: Giedre Beige

Adopted by: Cait Group Ltd

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Policies and governance

Cait Group Ltd is part of the TPMG Group and is supported by **TPMG Group Services Ltd**, operating as **Shared Services Hub**, for selected governance, administration, document-control and compliance-support functions.

Certain policies are maintained centrally through Shared Services Hub and adopted by relevant TPMG Group businesses. Where a policy applies to a specific company, the applicable legal entity is identified within the policy, schedule or related notice.

Privacy Notice

1. Introduction

Cait Group understands that your privacy is important and that you care about how your personal data is used.

This Privacy Notice explains how Cait Group collects, uses, stores, shares and protects personal data when you:

- visit our website;
- contact us;
- book a consultation;
- enquire about or buy services;
- purchase from our Policy Shop;
- access e-learning or training;
- subscribe to updates;
- interact with us as a client, supplier, partner or contractor; or
- otherwise engage with Cait Group.

We aim to handle personal data lawfully, fairly, transparently and securely. Your attached guidance notes and internal templates place the same emphasis on lawfulness, fairness, transparency, clear lawful bases, retention and rights.

2. What This Notice Covers

This Privacy Notice explains:

- what personal data we collect;
- how we collect it;
- how and why we use it;
- the lawful bases we rely on;
- who we may share it with;
- how long we keep it;
- how we keep it secure;
- your rights; and
- how to contact us or complain.

This Notice applies to personal data processed by Cait Group as a data controller. In some circumstances, third-party providers may process data on our behalf as processors, and where that happens we expect appropriate contractual and security safeguards to be in place.

3. What Is Personal Data?

Personal data means information relating to an identified or identifiable individual. This can include obvious details such as your name, email address and telephone number, but it can also include less obvious information such as IP address, online identifiers and device-related information where that information can be linked to you. Your own guidance notes highlight that online identifiers are likely to be common forms of personal data collected by many businesses.

4. Information About Us

Cait Group Ltd is part of the TPMG Group and is supported by **TPMG Group Services Ltd**, operating as **Shared Services Hub**

Registered Office / Head Office:

Cardinal Point
Park Road
Rickmansworth
WD3 1RE

Telephone: 020 3000 7502

General Enquiries: admin@cait-group.co.uk

Data Protection Officer: dpo@cait-group.co.uk

Website: www.cait-group.co.uk

5. Your Rights

Under UK data protection law, you may have the right to:

- be informed about how your personal data is used;
- access the personal data we hold about you;
- ask for inaccurate or incomplete personal data to be corrected;
- ask for personal data to be deleted in certain circumstances;
- ask us to restrict how we use your personal data in certain circumstances;
- object to processing based on legitimate interests;
- object to direct marketing;
- withdraw consent at any time where consent is the lawful basis; and
- request portability of certain personal data where applicable.

If you want to exercise any of these rights, please contact us using the details in section 15 below. ICO guidance confirms that privacy notices should explain people's information rights, including withdrawal of consent where consent is relied on, and how to complain.

If you are unhappy with the way we use your personal data, you also have the right to complain to the Information Commissioner's Office. We would, however, welcome the opportunity to deal with your concerns first.

6. What Personal Data We Collect

Depending on how you use our website or services, we may collect some or all of the following:

6.1 Identity and contact data

This may include:

- name;
- title;
- company or organisation name;
- job title;
- postal address;
- email address;
- telephone number; and
- other contact details you choose to provide.

6.2 Business and enquiry data

This may include:

- service requirements;
- consultation requests;
- project or operational information you share with us;
- correspondence records;
- notes from calls, meetings or consultations; and
- other information relevant to the enquiry or service.

6.3 Account, order and transaction data

If you buy from Cait Group or access digital products, this may include:

- billing details;
- order history;
- purchase records;
- training or course access records;
- learner activity records;
- payment status; and
- customer support records.

6.4 Technical and usage data

This may include:

- IP address;
- browser type and version;
- device type;
- operating system;
- pages viewed;
- referral source;
- timestamps;
- cookie or consent preferences; and
- other website interaction data.

Your attached templates and guidance notes make clear that privacy information should cover both obvious personal data and less obvious online identifiers, as well as explain collection methods such as forms, cookies and behind-the-scenes site data.

6.5 Marketing and communications preferences

This may include:

- whether you have opted in to updates;
- preferred communication channels; and
- unsubscribe or suppression preferences.

6.6 Supplier, partner and contractor data

If you act as a supplier, delivery partner or contractor, we may collect:

- contact details;
- business and due diligence information;
- contract administration data;
- onboarding information; and
- information relevant to assurance, risk, compliance or service delivery.

6.7 Applicant data

If you apply to work with Cait Group, we may collect:

- CV or career history;
- qualifications;
- contact details;
- interview notes; and
- related application information.

6.8 Special category data

We do not intentionally ask website visitors to provide special category personal data unless it is necessary and lawful to do so. However, you may choose to share such information with us, for example where it is relevant to accessibility, wellbeing, a complaint, a support request or a service requirement. If we process special category data, we will only do so where we have both a lawful basis and, where required, an additional lawful condition.

6.9 Children's data

Our website and services are not directed at children. We do not knowingly collect personal data from children unless this is specifically required in a lawful and appropriate context and with suitable safeguards.

7. How We Collect Personal Data

We may collect personal data:

- directly from you through website forms, consultation forms, contact forms, checkout pages, downloads, e-learning access, email, phone calls, meetings and other communications;
- automatically through cookies and similar technologies, depending on your consent choices and the cookies used on the site;
- from your employer or organisation where they engage us or introduce you in a business context;
- from service providers or platforms used to process bookings, payments, communications, training or website hosting;
- from publicly available business sources such as company websites, LinkedIn profiles or public registers where relevant to a legitimate business purpose; and
- from referrals, partners, suppliers or clients where relevant to an enquiry, service or ongoing relationship.

Your guidance notes specifically say privacy information should explain how data is collected, including behind-the-scenes collection through cookies and similar technologies, not just obvious form submissions.

8. How We Use Personal Data and Our Lawful Bases

We must have a lawful basis for using your personal data. The lawful basis we rely on depends on the context.

8.1 To respond to enquiries and consultation requests

We use identity, contact and enquiry data to:

- answer questions;
- assess what support may be relevant;
- arrange consultations; and
- follow up on requests.

Lawful basis: legitimate interests in operating and developing our business, and in some cases steps prior to entering into a contract.

8.2 To deliver services

We use personal data to:

- scope and provide advisory, assurance, audit, training, digital enablement and related services;
- manage relationships with clients and contacts;
- communicate during delivery;
- maintain records;
- provide support; and
- administer engagements.

Lawful basis: performance of a contract, steps prior to entering into a contract, and legitimate interests in delivering services properly.

8.3 To manage the Policy Shop and e-learning

We use personal data to:

- process purchases;
- provide access to digital products or learning content;
- confirm orders;
- manage billing and support;
- maintain training or download records; and
- administer customer service.

Lawful basis: performance of a contract, legal obligation, and legitimate interests in administering our business.

8.4 To manage payments and financial records

We use personal data to:

- issue and manage invoices;
- reconcile payments;
- handle refunds, disputes or chargebacks; and
- maintain financial and tax records.

Lawful basis: performance of a contract, legal obligation, and legitimate interests in business administration.

8.5 To improve our website, content and services

We may use technical and usage data to:

- maintain website security and performance;
- understand how our website is used;
- improve user experience;
- review what services, pages or resources are most useful; and
- support internal reporting or service development.

Lawful basis: legitimate interests in running and improving our website and business; and where required for non-essential cookies or tracking technologies, consent. ICO cookie guidance says non-essential cookies generally require clear information and consent before they are set, while strictly necessary cookies are treated differently.

8.6 To send updates and marketing

Where you opt in, or where otherwise permitted by law, we may use your contact details to send you:

- updates;
- insights;
- news about Cait Group services;
- invitations; and
- related communications.

Lawful basis: consent, and where relevant permitted legitimate interests under applicable direct marketing rules.

Your own template materials also distinguish ordinary service communications from marketing and make clear that opt-in and opt-out controls should be explained clearly.

8.7 To manage suppliers, partners and contractors

We may use personal data to:

- onboard and manage suppliers or partners;
- conduct reasonable due diligence;
- manage contractual relationships;

- coordinate service delivery; and
- support governance, risk or assurance activities.

Lawful basis: performance of a contract, legal obligation, and legitimate interests in running a secure and accountable business.

8.8 To comply with legal obligations and protect rights

We may use personal data:

- to comply with legal, regulatory or professional requirements;
- to respond to lawful requests from authorities;
- to establish, exercise or defend legal claims; and
- to investigate complaints, incidents, misconduct or security issues.

Lawful basis: legal obligation, legitimate interests, and where relevant establishment or defence of legal claims.

8.9 Automated decision-making

We do not currently use personal data for solely automated decision-making that produces legal or similarly significant effects on individuals.

9. Marketing Preferences

Where you choose to receive updates from Cait Group, we will use your details to send relevant marketing or insight communications. You can unsubscribe at any time using the unsubscribe link in the email or by contacting us.

Your wording on the website can therefore sit comfortably alongside this Notice:

**I'd like to receive updates from Cait Group. Unsubscribe at any time.
Your information will only be used by us in line with our Privacy Notice.**

10. Cookies and Similar Technologies

Our website may use cookies and similar technologies to:

- enable core website functionality;
- remember preferences or consent choices;
- improve site performance and usability;
- understand how users interact with the site; and
- support embedded content or relevant integrations.

Your attached cookie-law guidance notes and cookie templates say users must be informed about the purpose of cookies and, in many cases, consent must be obtained before non-essential cookies are placed. They also recommend prominent cookie information, clear categories and granular choice, rather than implied consent. ICO guidance says the same: PECR applies to cookies and similar technologies, and consent is required unless an exemption applies.

We will use cookies in line with our **Cookie Policy** and the cookie choices you make through our consent banner or preference tool.

Important note

If your website uses analytics, embedded videos, marketing pixels, maps, chat widgets, or third-party plugins, the separate Cookie Policy should list the actual cookies and providers in use. Your guidance notes also say a cookie audit is the best way to identify what cookies are set, what they do, how long they last and what data they collect.

11. Who We May Share Personal Data With

We do not sell personal data.

We may share personal data, where necessary and appropriate, with:

- IT, website hosting and cloud service providers;
- email, CRM and business administration providers;
- payment processors and payment service providers;
- e-learning, training or digital content platforms;
- professional advisers such as legal, compliance, audit or accounting advisers;

- service partners, trainers, contractors or specialists involved in delivery;
- regulators, courts, law enforcement or government bodies where required;
- insurers or other parties involved in claims, disputes or legal matters; and
- purchasers, investors or successor organisations if Cait Group or part of its business is restructured, sold or transferred.

Your guidance notes explain that privacy information should identify recipients or at least categories of recipient, and that categories can be used where naming each recipient is not practical.

Where third parties process data on our behalf, we expect them to handle it securely and lawfully.

12. International Transfers

We may use providers that store or access personal data outside the UK.

Where we transfer personal data internationally, we aim to ensure that a lawful transfer mechanism and appropriate safeguards are in place. Depending on the circumstances, this may include:

- transfer to a country recognised as adequate;
- use of approved contractual safeguards; or
- another lawful mechanism permitted by applicable law.

Your attached privacy guidance notes say privacy information should explain if data is transferred outside the UK, and should identify the safeguard used. ICO guidance also requires you to explain international transfers and relevant safeguards where applicable.

If you want more information about any international transfer safeguards we rely on, you can contact us.

13. How Long We Keep Personal Data

We do not keep personal data for longer than necessary.

Retention periods vary depending on the nature of the data and the reason we hold it. In general, Cait Group may retain personal data for the following periods or by reference to the following criteria:

- **General enquiries and contact requests:** usually up to 24 months from the last meaningful contact, unless a longer period is needed for legal, operational or evidential reasons.
- **Consultation and client relationship records:** usually up to 6 years after the end of the relationship or final substantive interaction, unless longer retention is required by law or justified by a live claim, complaint, audit or dispute.
- **Policy Shop and e-learning transaction records:** usually up to 6 years for accounting, tax, contract and dispute-management purposes.
- **Marketing records and preferences:** until you unsubscribe, withdraw consent, or after a reasonable period of inactivity, subject to suppression records being retained where needed to honour your opt-out.
- **Supplier and partner records:** usually up to 6 years after the end of the relationship, unless longer retention is needed for audit, legal or assurance reasons.
- **Job applicant data:** usually up to 12 months after the relevant recruitment decision, unless a longer period is agreed or justified.
- **Technical and cookie-related data:** in line with our cookie settings, website retention practices and provider configuration.

Your guidance notes say retention periods should be stated, or the basis for deciding them if there is no fixed period. ICO guidance says privacy notices should explain how long information is kept or how retention is determined.

We may retain data for longer where necessary to comply with law, resolve disputes, defend claims, maintain suppression lists, or evidence compliance.

14. How We Keep Personal Data Secure

We take personal data security seriously and use appropriate technical and organisational measures designed to protect personal data against accidental or unlawful loss, destruction, misuse, alteration, unauthorised disclosure or access.

Those measures may include:

- access controls and role-based permissions;
- secure systems, devices and authentication;
- confidentiality obligations;
- supplier and processor due diligence;
- encryption or secure transfer methods where appropriate;
- backup, resilience and recovery arrangements;
- breach detection and escalation procedures; and
- proportionate review and improvement of security measures.

Your examples and guidance materials repeatedly emphasise limiting access to those with a legitimate need to know, maintaining confidentiality, breach procedures, and documenting appropriate technical and organisational measures.

15. How to Contact Us

If you want to ask questions about this Privacy Notice, exercise your rights, update your information, or make a complaint, please contact:

Cait Group Ltd is part of the TPMG Group and is supported by **TPMG Group Services Ltd**, operating as **Shared Services Hub**,

Cardinal Point, Park Road, Rickmansworth, WD3 1RE

Tel: 020 7060 6228

General enquiries: admin@cait-group.co.uk

Data Protection Officer: dpo@cait-group.co.uk

Website: www.cait-group.co.uk

16. Complaints

If you are unhappy with how we have handled your personal data, please contact us first so we can try to resolve the issue.

You also have the right to complain to the Information Commissioner's Office.

17. Changes to This Notice

We may update this Privacy Notice from time to time to reflect changes in:

- law or regulation;
- ICO guidance;
- our services;
- our website;
- our systems or suppliers; or
- the way we process personal data.

Where appropriate, the updated version will be posted on our website with a revised effective date.

Your templates and guidance notes also recommend reviewing privacy information regularly and updating it when the law or business processing changes.