



AGINCOURT PARTNERS

DATA PRIVACY NOTICE

Agincourt Partners Ltd

Version 2.0 | June 2026

This notice explains what personal data we collect about you, why we collect it, how we use it and what rights you have. It applies to our website, our licensed cybersecurity products and our consultancy services.

This notice covers our activities as a data controller. Where we act as a data processor on behalf of a client organisation, a separate data processing agreement will govern that relationship.

Please take a few minutes to read this. If anything is unclear, contact us at privacy@agincourtpartners.co.uk.

1. Who We Are

Agincourt Partners Ltd is registered in England and Wales. We are the data controller responsible for your personal data collected through this website and in connection with our services. We were formerly known as Agincourt Partners Ltd trading as Cybersec Solutions.

Registered Office: Southview Cottage, Woodrow, Amersham, HP7 0QQ

Telephone: +44 1494 936696

Data contact: privacy@agincourtpartners.co.uk.

We are registered with the Information Commissioner's Office (ICO). If you would like to verify our registration, you can search the ICO's Data Protection Register at ico.org.uk. Our registration reference is ZA750085.

2. Personal Data We Collect

We only collect personal data that is necessary for the purposes set out in this notice. We collect the following categories:

- **Identity data:** your name and job title.
- **Contact data:** email address, postal address and telephone number.



- **Business data:** the name and sector of your organisation, relevant to the products or services you have enquired about or purchased.
- **Communications data:** records of correspondence between us, including enquiries and support requests.

We also collect anonymised, aggregated data about website usage (such as page visit counts). This data cannot identify you and does not constitute personal data.

We do not collect or process special category personal data (such as health, biometric or political data) or data relating to criminal convictions. We do not knowingly collect data from children under 18.

3. How We Collect Your Personal Data

We collect personal data in the following ways:

- **Directly from you:** when you contact us by email, telephone or via our website, when you request a product demonstration, when you purchase a licence or engage our consultancy services, or when you subscribe to our communications.
- **From publicly available sources:** such as company websites or professional directories, where relevant to a business enquiry.

4. How We Use Your Personal Data

We only use your personal data where we have a lawful basis to do so. The table below sets out our purposes for processing and the legal basis we rely on in each case.

Purpose	Type of data	Lawful basis
Responding to your enquiries and providing quotes	Identity, Contact, Business, Communications	Legitimate interests (responding to business enquiries)
Performing a contract for licensed products or consultancy services	Identity, Contact, Business	Performance of a contract
Sending you marketing about our products and services (where you have not opted out)	Identity, Contact	Legitimate interests (direct marketing to existing contacts under PECR)



Sending you marketing where you have opted in	Identity, Contact	Consent
Maintaining our accounts and records	Identity, Contact, Business	Legal obligation / Legitimate interests
Improving our website and services using anonymised analytics	Anonymised usage data	Legitimate interests (business improvement)

Where we rely on legitimate interests, we have assessed that our interests do not override your rights and freedoms. You can request details of that assessment by contacting us at privacy@agincourtpartners.co.uk.

5. Marketing

We may send you information about our cybersecurity products and services by email or telephone if you are an existing customer or have made an enquiry and have not opted out. This is consistent with the Privacy and Electronic Communications Regulations (PECR).

Where you are a new contact and we do not have an existing relationship with you, we will only send marketing communications where you have given your consent.

You can opt out of marketing at any time by:

- clicking the unsubscribe link in any marketing email, or
- emailing privacy@agincourtpartners.co.uk.

Opting out of marketing will not affect communications related to a contract or service you have with us.

We will not share your personal data with third parties for their own marketing purposes without your express consent.

6. Cookies and Website Technologies

Our website uses cookies and similar technologies. We distinguish between:

- **Strictly necessary cookies:** required for the website to function. No consent is needed for these.



- **Analytics cookies:** used to collect anonymised data about how visitors use our site, to help us improve it. Following ICO guidance updated in April 2026, analytics cookies that collect only aggregate data about service use (and not individual-level data) may be exempt from the consent requirement under the Data (Use and Access) Act 2025. Where personal data is involved, we comply with UK GDPR.

Full details of the cookies we use and how to manage them are available in our Cookie Policy, accessible from our website footer.

7. Who We Share Your Personal Data With

We share personal data only where necessary. Recipients may include:

- **IT and hosting providers:** acting as processors, based in the UK, who support our systems and website.
- **Professional advisers:** including accountants, lawyers and insurers, acting under duties of confidentiality.
- **Regulators and law enforcement:** where required by law.
- **Prospective buyers of our business:** in the event of a sale or restructure, subject to appropriate confidentiality obligations.

We do not sell your personal data. All third-party processors are contractually required to handle your data securely and only for the purposes we specify.

8. International Transfers

Where we transfer personal data outside the UK, we ensure an equivalent level of protection is in place. The mechanisms we use include:

- adequacy regulations made by the UK Secretary of State confirming the destination country offers equivalent protection, or
- International Data Transfer Agreements (IDTAs) approved by the ICO, or
- the UK Addendum to the EU Standard Contractual Clauses, where applicable.

You can request details of the transfer mechanism used for any specific transfer by contacting us at privacy@agincourtpartners.co.uk.



9. Data Security

We apply technical and organisational security measures appropriate to the risks involved, consistent with our obligations under Article 32 UK GDPR. As a cybersecurity business, security is central to how we operate.

Our measures include access controls, encrypted communications, network monitoring and regular security assessments. Access to personal data is restricted to those with a business need to process it.

We have a procedure for managing personal data breaches. Where a breach meets the threshold for notification, we will report it to the ICO within 72 hours and, where required, inform affected individuals without undue delay.

10. How Long We Keep Your Data

We keep personal data only for as long as necessary for the purpose for which it was collected, or as required by law. Our key retention periods are:

- Customer records (including contract, financial and transaction data): 7 years from the end of the relationship, to meet HMRC requirements and to address potential legal claims.
- Marketing contact records: until you opt out or we determine the data is no longer relevant.
- Enquiry records where no contract resulted: 12 months from the date of last contact.
- Website analytics data: held in anonymised form and retained as long as needed for service improvement purposes.

When data is no longer required, it is securely deleted or anonymised. You can request deletion of your data at any time, subject to legal obligations that require us to retain it.

11. Your Rights

Under UK GDPR and the Data Protection Act 2018, you have the following rights in relation to your personal data:

- **Right of access:** you can request a copy of the personal data we hold about you.
- **Right to rectification:** you can ask us to correct inaccurate or incomplete data.
- **Right to erasure:** you can ask us to delete your data where there is no longer a lawful basis to retain it.



- **Right to restrict processing:** you can ask us to pause processing of your data in certain circumstances.
- **Right to data portability:** where processing is based on consent or contract and carried out by automated means, you can ask us to provide your data in a structured, commonly used format.
- **Right to object:** you can object to processing based on legitimate interests or for direct marketing. We will stop unless we can demonstrate compelling legitimate grounds.
- **Right to withdraw consent:** where processing is based on consent, you can withdraw it at any time. Withdrawal does not affect the lawfulness of processing before the withdrawal.

To exercise any of these rights, contact us at privacy@agincourtpartners.co.uk. We will respond within one month. For complex or multiple requests, we may extend this by a further two months and will notify you if we do so.

We will not charge a fee unless a request is manifestly unfounded or excessive, in which case we may charge a reasonable administrative fee or decline to respond.

12. Complaints

If you are unhappy with how we have handled your personal data, please contact us first at privacy@agincourtpartners.co.uk. We aim to resolve complaints promptly.

Under the Data (Use and Access) Act 2025, we are required to have a data protection complaints process. If we do not resolve your complaint to your satisfaction, you have the right to complain to the ICO:

- Website: ico.org.uk/make-a-complaint
- Telephone: 0303 123 1113
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

13. Changes to This Notice

We review this notice regularly and will update it when our practices change or when required by law. The current version and date are shown at the top of this document.

We will notify you of material changes where we have your contact details.

Please keep us informed if your personal data changes so we can keep our records accurate.