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# Privacy Policy

## Privacy Statement

Pylon One respects your privacy and is committed to protecting your personal data. This privacy notice will inform you about how we use and look after your personal data when you visit our website and when we provide our services to you regardless of where you visit from and tell you about your privacy rights and how the law protects you.



**John Houchin**
**Director**
**26.10.2026**



**Mark Lyons**
**Director**
**20.10.2026**

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## Document History

Sign off:

| Name | Designation | Date |
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| John Houchin | Director | 02/09/2025 |
| Mark Lyons | Director | 02/09/2025 |
| Jake Lee | ISM | 02/09/2025 |

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The issue status of this document is indicated by the issue number and date detailed below. When any part of this document is amended, issue numbers, dates and a record of the changes is recorded here.

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| | | | | |

## Introduction

Your privacy is important to us. This Privacy Policy outlines how we handle your personal information when you use our services. It explains what data we collect, how we use it, the steps we take to keep it secure, and the rights you have regarding your information.

We are committed to being transparent about our practices and ensuring that your data is protected. Please use the Glossary to understand the meaning of some of the terms used in this policy.

## 1. Important information and who we are

**Purpose of this privacy notice**

This privacy notice aims to give you information on how Pylon One Limited collects and processes your personal data through all your engagements with us when using our services and this website, including any data you may provide when you sign up to our services, our newsletters or request information about other services from Pylon One.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

**Data Controller**

Pylon One Limited is the controller and responsible for your personal data (collectively referred to as "Company Name Limited", “XXX”, ”Company Name”, "we", "us" or "our" in this privacy notice).

You have the right to make a complaint at any time to the competent supervisory authority for data protection issues. In the UK, this is the Information Commissioner’s Office (ICO). Contact details can be found at www.ico.org.

At Pylon One we would, however, appreciate the chance to understand and address your concerns before you approach the competent supervisory authority so please contact us in the first instance. Email pylon@pylonone.com

Changes to the privacy notice and your duty to inform us of changes

**This version was last updated on 14th May 2020.**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

**Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed, i.e. aggregated or anonymous data).

For clients and users of our products and services, we may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

- Identity Data includes - first name, last name, username or similar identifier, title, date of birth and gender.
- Contact Data includes - billing address, delivery address, email address and telephone numbers.
- Financial Data includes - bank account details.
- Transaction Data includes - details about payments to and from you and other details of services you have purchased from us.
- Technical Data includes - internet protocol (IP) address, your login data, browser type, language and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website and our services.
- Profile Data includes - your username and password, services purchased by you, your interests, preferences, feedback.
- Usage Data includes - information about how you use our website, services.
- Marketing and Communications Data - includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

## 3. How is your personal data collected?

We use different methods to collect data from and about you including through:
Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms, agreements or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you

- Apply for our services;
- Enter into an agreement with us;
- Subscribe to our service or publications;
- Give us some feedback.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, [server logs] and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

- a) Analytics providers such as Google based outside the EU;
- b) Credit and reference checking agencies
- c) Identity and Contact Data from publicly availably sources such as Companies House and the Electoral Register based inside the EU.

## 4. How we use your personal data

We will only use your personal data for the purposes we communicate to you and when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform specific actions in support of the contract we are about to enter into or have entered into with our clients, partners and third parties.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- To inform you of relevant activities and services from Pylon One and our key partners.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us at pylon@pylonone.com

**Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

| **Purpose/Activity** | **Type of data** | **Lawful basis for processing including basis of legitimate interest** |
|---|---|---|
| To register you on our key contacts database. | (a) Identity<br>(b) Contact | Legitimate Interest – providing a service to new and existing clients as well as employees, contractors and job candidates. |
| To process your agreement including:<br>(a) Manage payments, fees and charges<br>(b) Collect and recover money owed to us | (a) Identity<br>(b) Contact<br>(c) Financial<br>(d) Transaction<br>(e) Marketing and Communications | (a) Performance of a contract with you<br>(b) Necessary for our legitimate interests to keep our records updated (and pay monies owing or recover debts due to us). |
| To manage our relationship with you which will include:<br>(a) Notifying you about changes to | (a) Identity<br>(b) Contact<br>(c) Profile | (a) Necessary for our legitimate interests – providing products and services<br>(b) Necessary for our legitimate interests to keep our |

| Purpose/Activity | Type of data | Lawful basis for processing including basis of legitimate interest |
|---|---|---|
| our terms or privacy policy<br>(b) Informing you of relevant product and service updates<br>(c) Sending our newsletter, invite to an event or take a survey | (d) Marketing and Communications | records updated as to areas of interest and to study how interested parties use our services. |
| To deliver relevant website content and potential available services to you and measure or understand the effectiveness of the details we share with you | (a) Identity<br>(b) Contact<br>(c) Profile<br>(d) Usage<br>(e) Marketing and Communications<br>(f) Technical | Necessary for our legitimate interests to study how Leaseholder/client/occupiers use our services, to develop them, to grow our business and to inform our marketing strategy |
| To use data analytics to improve our website, services, marketing, client / potential client relationships and experiences | (a) Technical<br>(b) Usage | Necessary for our legitimate interests to define types of interested parties for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy. |
| To make suggestions and recommendations to you about products, services, events or updates that may be of interest to you | (a) Identity<br>(b) Contact<br>(c) Technical<br>(d) Usage<br>(e) Profile | Necessary for our legitimate interests to develop our services and grow our business) |

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and communications.
You will receive marketing communications from us if you have requested information from us or entered into a contract for services from us or if you provided us with your details when you registered interest in one of our services and, in each case, you have not opted out of receiving that marketing.
Third-party marketing - We do not sell your personal details to third party partners for marketing purposes.

## Opting out

You can ask us to stop sending you marketing communications emails at any time by following the opt-out links on any marketing or communication message sent to you or by contacting us at any time.
Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of any contractual or legal relationship we have with you.

**Cookies**

We employ cookie technology (refer to our cookie policy) to help log visitors to our web site. Cookies are pieces of data that are often created when you visit a website, and which are stored in the cookie directory of your computer or mobile device. A number of cookies may be created when you visit the Pylon One, Multiverse Analytics or Delegate Live websites. The cookies do not contain any personal information about you, and they cannot be used to identify an individual user.
You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some of the enhanced features of this website may become inaccessible or not function properly.

**Log files**

When you visit this website we collect web statistics concerning your visit, which are stored in a log file. Log files allow us to record visitors' use of the site. Log files are also used to detect potential harmful users which may be reported to the relevant authorities.

## 5. Disclosures of your personal data

We may have to share your personal data with relevant third parties for the operation of your contract with Pylon One.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6. International transfers

As a Data Controller, we will not transfer your personal data outside the European Economic Area (EEA).

## 7. Data security

We treat the privacy and security of the personal data we hold very seriously.
We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected or confirmed data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. Data retention

**How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this aggregated information indefinitely without further notice to you.

## 9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see these within the glossary below (link)

If you wish to exercise any of the rights set out above, please contact us

No fee usually required. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we reserve the right to charge a reasonable fee if we believe that your request is clearly repetitive or excessive.

Where we believe that a request is excessive, e.g. significant amounts of data are requested, we will attempt to clarify in more detail exactly what you are looking for.

Alternatively, we may refuse to comply with your request in these circumstances

**What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is

a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond**

We endeavour to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. In such cases we will respond within two months of the date we clarified your request or the fee to access the data was paid.

**Your right to complain**

You have the right to make a complaint at any time to the competent supervisory authority for data protection issues. In the UK, this is the Information Commissioner's Office (ICO). Contact details can be found at www.ico.org.

We would, however, appreciate the chance to understand and address your concerns before you approach the competent supervisory authority. So please contact us in the first instance.

## 10. Glossary

**DATA SUBJECT**

A living natural person, who has rights regarding their personal data and can be identified through personal identifiable information (PII).

**DATA PROCESSING**

The collection, storage, access, use, sharing, manipulation and deletion of personal data.

**SUPERVISORY AUTHORITY**

The national body that regulates the General Data Protection Regulations (GDPR) in an EU member state. In the UK, the Supervisory Authority is the Information Commissioner's Office (ICO), details of which can be located at www.ico.org

**LAWFUL BASIS**

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

**THIRD PARTIES**

Service providers [acting as processors] based within the EU who provide IT and system administration services

Professional advisers [acting as processors or joint controllers] including lawyers, bankers, auditors and insurers based within the EU who provide [consultancy, banking, legal, insurance and accounting services].

HM Revenue & Customs, regulators and other authorities [acting as processors or joint controllers] based in the United Kingdom [who require reporting of processing activities in certain circumstances].

**YOUR LEGAL RIGHTS**

**As a Data Subject, you have the right to:**

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy, in an agreed machine-readable format, of the personal data we hold about you and to check that it is complete, current and we are lawfully processing it.

In certain situations, we may seek further clarification of your data access request, e.g. where the request is complex or sizeable

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. Also known as the right to rectification.

Request erasure of your personal data. Also commonly known as the “right to be forgotten”. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.

Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- (a) if you want us to establish the data's accuracy;
- (b) where our use of the data is unlawful but you do not want us to erase it;
- (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.

Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. Withdraw consent at any time where we are relying on your consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain

products or services to you. We will advise you if this is the case at the time you advise us of your request to withdraw your consent.

**Cookie Policy**

We use some cookies on our site. Cookies store some information on your computer. This page tells you about the kind of cookies we use.

**What is a cookie?**

A "cookie" is technology that allows our website to store tokens of information (an 'identifier') in your browser used only by our website while you are on our website. Cookies are not used to determine the personal identity of anyone who is merely visiting our website. They serve to help us track traffic patterns to determine a user's preferred location and language for us to direct user to the correct country home page when they visit our website. On specific pages of our website, cookies are used to help us track your interests while you browse the internet. This is to assist us to understand what is important to you and to tailor more relevant direct marketing to you.

**What cookies do we use?**

**Type 1 Cookies**

Example: CMSSESSID67392540 - a session cookie.

These cookies are essential, as they ensure your security and privacy when you use our secure sites, as well as enabling you to move around a website and use its features. Without these cookies, services you've asked for (such as access to secure areas) can't be provided. These cookies don't gather information about you that could be used for marketing or remembering where you've been on the internet.

**Type 2 Cookies**

Examples: _utma, _utmb, _utmc, _utmz - Google analytics cookies
These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages.

**Type 3 Cookies**

Examples: _apt_user_id, _apt_session_id.

We set first-party domain cookies only. These are used for analytical purposes and are non-intrusive. They are not shared with any third-parties and are used purely for the purposes of improving the customers journey and experience'.

The cookies we set allow us to track and record web visit data. The cookies names we set are

_apt_user_id and _apt_session_id.

_apt_user_id allows us to identify a specific user.

_apt_session_id allows us to identify a session for a user.

By using our website, you agree that we can place these types of cookies on your device.

**How do I disable cookies?**

You can set your computer to warn you each time a cookie is sent or turn off all cookies (except Flash cookies) through your browser. Check your browser's Help menu or your built-in mobile device settings to find out how. If you do not accept cookies, some features, services or activities that are available on our websites may be affected and you may be unable to perform certain transactions, use certain functionality, and access certain content.

For more information about this policy or to report a concern, please contact the Senior Management team via pylon@pylonone.com.