

# 2025 Xperfecta General Privacy Policy 1.2

To be published on website: Yes

**Last Review Date:** 01/09/2025

Review Cycle: Annual

Next Review Date: 01/09/2026

Policy Ownership: Dr C D Buckingham, Mr D H Billson

#### 1. Introduction

This Privacy Policy explains how Xperfecta ("we", "us", or "our") collects, uses, and protects information about visitors to our website, xperfecta.com ("the Website").

We are committed to protecting your privacy and handling your data in a transparent and secure way. This policy applies only to our Website and not to any other sites that may be linked from it.

#### 2. Who we are

This website is operated by Egrist Ltd, trading as Xperfecta. Registered address: Coombe House, Stoke, Hartland, Bideford, Devon, United Kingdom, EX39 6DU.

We act as the data controller for personal data collected through this Website.

Our Data Protection Officer (DPO) is Dr Christopher Buckingham, who can be contacted at info@xperfecta.com.

#### 3. Information we collect

We do not collect any personal information unless you choose to provide it (for example, by using the contact us form). If you complete a contact form on our Website, the information you provide is securely transmitted to and stored on our server. This allows us to respond to your inquiry and maintain records of legitimate business communications

When you visit our Website, we may collect limited information through Matomo Analytics, but only if you consent via our cookie banner. You can read more about this in our Cookie Policy.

### 4. Legal basis for processing

Under the UK General Data Protection Regulation (UK GDPR), our use of cookies and analytics is based on your consent.

Website analytics (Matomo): Processed only with your consent through our cookie banner.

Contact forms: Processed under our legitimate interest in responding to enquiries and maintaining business communications.

### 5. Data retention

Matomo temporarily processes limited technical information, such as your IP address, to generate anonymised analytics. IP addresses are anonymised after collection, and any data that could be considered personal is deleted within 12 months.

We retain only aggregated and fully anonymised data, which may be kept indefinitely for statistical purposes.

Contact form submissions are stored on our server for as long as necessary to respond and for our internal records, after which they are securely deleted or archived.

### 6. International transfers

All of our servers, including those used for website analytics and contact form data, are hosted within the United Kingdom. We do not transfer data outside of the UK or European Economic Area (EEA).

# 7. Your rights

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

- Access a copy of your personal data
- Request correction or deletion of your data
- Withdraw consent for processing
- Object to the processing of your data
- You also have the right to data portability and to restrict or object to processing.

To exercise these rights, please contact us at info@xperfecta.com. Because we do not store any personally identifiable information through this Website, we may not be able to identify you in our systems. You can lodge a complaint with the Information Commissioner's Office (ICO) at www.ico.org.uk.

### 8. Children's privacy

Our Website is not directed toward children under the age of 18, and we do not knowingly collect personal data from them.

### 9. Cookies and consent

We use a cookie banner to ask for your consent before enabling analytics cookies. You can change your choice at any time using the toggle on the policies page. For detailed information on how we use cookies, please refer to our Cookie Policy.

## 10. Data security

Our Website is hosted securely via GitHub Pages, and all connections use HTTPS encryption. Analytics data is stored on our own server, managed securely and not shared with any third party. Data from the contact form is also securely stored on our own server.

We regularly review our security measures to keep data safe.

# 11. Changes to this policy

We may update this Privacy Policy occasionally to reflect changes in our practices or legal requirements. Any updates will appear on this page with a revised last review date.

#### 11. Contact us

If you have questions regarding the contents of this policy, you can contact our Data Protection Officer by email: info@xperfecta.com (please mark your message For the attention of the Data Protection Officer)