DATA PRIVACY NOTICE

2026

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Table of Contents

Table of Contents 1

Purpose 2

Barefoot Cyber - Privacy Notice 3

Personal Data 4

Dark Web monitoring and Security monitoring 5

International Transfers 6

Retention of Data 6

Client 6

Contact via our website 7

Employees 7

Data Subject Requests 8

Purpose

The purpose of this Privacy Notice is to explain how barefoot Cyber collects, uses, stores, shares, protects and otherwise processes personal information in accordance with applicable data protection and privacy legislation, including the Protection of Personal Information Act, 2013 (POPIA), the General Data Protection Regulation (GDPR) and other global privacy regulations. This Privacy Notice also describes the rights of data subjects and the measures implemented by the Company to ensure that personal information is processed lawfully, transparently, and securely.

Barefoot Cyber - Privacy Notice

This document provides details of how we, Barefoot Cyber collect personal data and how we process it in accordance with the privacy regulations such as GDPR and PoPIA.

Company Details

United Kingdom

Registered Name: Barefoot Cyber Ltd

Company No: 14307736

Chief Executive: Iain Wadds

Data Protection Officer: Iain Wadds

Netherlands

Registered Name: Barefoot Cyber B.V

Company No (KvK number): 99755742

Chief Executive: Iain Wadds

Data Protection Officer: Iain Wadds

South Africa

Registered Name: Barefoot Security (Pty) Ltd

Company No: 2017101551

Chief Executive: Iain Wadds

Data Protection Officer: Iain Wadds

Personal Data

Barefoot Cyber processes personal data only for the purpose for which it was collected and with your consent. You may make a request to see what personal data we are holding (see Data Subject Requests) or withdraw your consent at any time (see Withdrawing Consent). Barefoot Cyber regularly reviews its working processes around privacy. The following details the purpose and legal basis for processing your data.

We may collect or process the following data:

- Names and surnames
- Email addresses
- Telephone numbers
- Job titles
- Company details
- Identity or employee numbers where applicable
- User account information
- IP addresses
- Device and browser information
- Website usage information

How we collect personal data:

- Through security monitoring systems
- Through authorised dark web monitoring activities
- Directly from data subjects
- Through our website
- During service onboarding
- Through contractual engagements

How we use personal data:

- Monitor and secure information systems
- Detect, investigate and respond to security incidents
- Comply with legal and regulatory obligations
- Improve our products and services
- Deliver cybersecurity services
- Provide customer support

- Manage contractual relationships

Dark Web monitoring and Security monitoring

As part of the services we offer as a cybersecurity company, we may collect, analyse and process security related information including:

- System and network logs
- Indicators of compromise
- Authentication logs
- Security events

Through our deXpose dark web monitoring service, we may monitor publicly available breach repositories, threat intelligence feeds and dark web sources to identify information associated with our clients' domains, email addresses or digital assets that may indicate potential compromise or exposure.

Information obtained through these services is processed for cybersecurity, threat detection, risk management and incident response purposes.

International Transfers

To provide our services, personal information and security related data may be processed, stored or backed up in three different regions:

- Cape Town, South Africa
- Frankhurt, Germany
- Ohio, United States of America

Where personal data is transferred across borders, appropriate technical, contractual, and organisational safeguards are in place to protect such information in accordance with applicable privacy laws.

Retention of Data

Personal information will only be retained for as long as necessary to fulfil the purpose for which it was collected, comply with legal obligations or resolve disputes.

Client

Prior to us being able to enter into a contract with any potential client, we are required to

request a certain amount of your personal data. We will process and retain this information with your consent and/or whilst it is in the legitimate interests of both parties or until your constant is withdrawn.

We process client personal information to:

- Provide security monitoring and reporting
- Meet legal and contractual obligations
- Communicate regarding services and incidents
- Service delivery

Contact via our website

Should you wish to engage with us via our website, we ask you provide some additional information, including your contact details so we might respond to your request. In each case, Barefoot Cyber collects information only as necessary or appropriate to fulfil the purpose of your interaction. Barefoot Cyber does not disclose personally identifying information to third parties without your additional consent.

We will process and retain this information with your consent and/or whilst it is in the legitimate interests of both parties or until your constant is withdrawn.

Employees

The personal data of our employees is captured and used with the formal documents each received at the point of an offer of employment. These details are retained by Barefoot Cyber for the duration of the individuals' employment and whilst it is in the legitimate interests of both parties or until constant is withdrawn.

Employee personal data is processed for:

- Recruitment and employment administration
- Payroll administration
- Information security management
- Compliance with employment

Prospective Employees

Where personal information is willingly presented to Barefoot Cyber in the form of a CV/resume. These details are retained by Barefoot Cyber during the individuals' consideration for employment and whilst it is in the legitimate interests of both parties or until constant is withdrawn.

We may collect the following data:

- Curriculum vitae (CVs)
- Qualifications
- Employment history
- References
- Background verification information

On occasion, your personal data might be used for other communications, but only after we have your consent, or we have established a legal justification for such an activity.

Data Subject Requests

You are entitled, at any time to request a review of any personal information Barefoot Cyber are holding about yourself. If you believe the information is incorrect, please ensure we are notified so that this may be corrected. You can do this by sending an email to privacy@barefootcyber.com.

Withdrawing Consent

If you believe that Barefoot Cyber either have no legal basis to retain and process your personal data, or you simply prefer that we no longer did so, you may withdraw your consent at any time by sending an email to privacy@barefootcyber.com.

Withdrawal of consent will not affect the lawfulness of processing carried out before such withdrawal.

Lodging a Complaint

If you believe Barefoot Cyber are not abiding to the details contained within this Privacy Statement, you have the right to lodge a complaint with the Supervisory Authority in your region at:

United Kingdom

Information Commissioner's Office

Water Lane

Wycliffe House

Wilmslow

Cheshire SK9 5A

Finternational.team@ico.org.uk

+44 1625 545 745

www.ico.org.uk

South Africa
The Information Regulator
SALU Building
316 Thabo Sehume Street
Pretoria

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www.justice.gov.za/inforeg