

APR RISKS LTD

Protection with Clinical Precision

PRIVACY POLICY

aprrisks.com | Company No. 17043744

Effective Date: 29 June 2026

Version 1.0

1. Introduction

APR Risks Ltd ("APR Risks", "we", "our", or "us") is committed to protecting and respecting your privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal data when you visit our website at aprrisks.com (the "Website"), make an enquiry, or use any of our services.

APR Risks Ltd is a company registered in England and Wales under company number 17043744, with its registered office at 124 City Road, London, EC1V 2NX, United Kingdom. We act as the data controller for the personal data described in this policy.

This policy is written in compliance with the UK General Data Protection Regulation (UK GDPR) as retained in UK law by the European Union (Withdrawal) Act 2018, the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003 (PECR), and, where applicable, the California Consumer Privacy Act 2018 as amended by the California Privacy Rights Act 2020 (CCPA/CPRA).

If you have any questions about this policy or wish to exercise your privacy rights, please contact us at: accounts@aprrisks.com

2. Data We Collect

We may collect and process the following categories of personal data:

2.1 Information You Provide to Us

- **Contact enquiry data:** When you submit an enquiry through our website contact form, we collect your name, email address, and the content of your message.

2.2 Data Collected Automatically

When you visit our Website, certain data is collected automatically by our systems and third-party services:

- **Usage and analytics data:** Pages visited, time spent on pages, referring URL, session duration, and general geographic region (country or city level)
- **Device and technical data:** IP address, browser type and version, operating system, device type, and screen resolution
- **Cookie data:** Data collected via cookies and similar tracking technologies (see Section 5)

2.3 Data Collected by Third Parties on Our Behalf

The following third-party services operate on our Website and may collect personal data independently in accordance with their own privacy policies:

- Google LLC (Google Analytics 4, reCAPTCHA, Google Maps)
- Meta Platforms Inc. (Meta Pixel — where active)
- GoDaddy Inc. (website hosting and contact form processing)

We do not collect special category data (such as health, financial, or biometric data) through our Website.

3. How We Use Your Data

The table below sets out each purpose for which we process personal data, the data used, the lawful basis under the UK GDPR, and the applicable retention period.

Purpose	Data Used	Lawful Basis (UK GDPR)	Retention Period
Responding to website enquiries	Name, email, message content	Legitimate interest (Art. 6(1)(f)) — responding to business communications	24 months from last contact
Analysing website traffic and improving user experience	IP address, usage data, cookie identifiers	Consent (Art. 6(1)(a)) — analytics cookies only active with your consent	14 months (Google Analytics default)
Protecting our website from spam and automated abuse	IP address, browser fingerprint, interaction data (reCAPTCHA)	Legitimate interest (Art. 6(1)(f)) — website security	Duration of session; Google's own retention applies
Displaying our office location	IP address (Google Maps embed)	Legitimate interest (Art. 6(1)(f)) — operational information	Session only
Advertising and remarketing (where consented)	Cookie identifiers, IP address, browsing behaviour (Meta Pixel)	Consent (Art. 6(1)(a)) — only active with your cookie consent	90 days (Meta Pixel cookie)
Maintaining records of cookie consent	Consent choice and timestamp	Legal obligation / legitimate interest (Art. 6(1)(c)/(f))	12 months
Complying with legal obligations	Any relevant personal data	Legal obligation (Art. 6(1)(c))	As required by applicable law

4. Legal Basis for Processing

Under the UK GDPR, we must have a lawful basis for processing your personal data. The bases we rely on are:

- **Consent (Article 6(1)(a)):** Where you have given clear, specific consent — for example, accepting analytics or advertising cookies via our cookie banner. You may withdraw consent at any time without detriment by adjusting your cookie preferences or contacting us.
- **Legitimate Interests (Article 6(1)(f)):** Where processing is necessary for our legitimate business interests, such as responding to enquiries, maintaining website security, and improving our services, provided those interests are not overridden by your rights and interests.
- **Legal Obligation (Article 6(1)(c)):** Where we are required to process data to comply with a legal obligation, such as retaining records as required by applicable law.

5. Cookies and Tracking Technologies

Our Website uses cookies and similar technologies. A cookie is a small text file placed on your device when you visit a website.

5.1 Cookie Categories

We use the following categories of cookies:

Essential / Functional Cookies — These cookies are necessary for the Website to function and cannot be switched off. They include cookies that record your cookie consent preference.

Analytics Cookies — These cookies help us understand how visitors interact with our Website. We use Google Analytics 4 for this purpose. These cookies are only set with your consent.

Advertising Cookies — These cookies may be set by our advertising partners (including Meta Platforms Inc.) to build a profile of your interests and display relevant advertisements on other platforms. These are only active where you have provided consent.

5.2 Cookie Table

Cookie Name	Provider	Category	Purpose	Duration
_ga	Google Analytics	Analytics	Distinguishes unique users	2 years
ga[ID]	Google Analytics	Analytics	Maintains session state for GA4	2 years
_gcl_au	Google	Advertising	Conversion measurement	90 days
_fbp	Meta Platforms Inc.	Advertising	Identifies browsers for Meta advertising	90 days
CONSENT	Google	Functional	Records cookie consent state	2 years
[gdsite_consent]	GoDaddy	Functional	Records user's cookie banner choice	1 year

5.3 Managing Your Cookie Preferences

You may accept or decline non-essential cookies via the cookie banner displayed when you first visit our Website. You may also manage or withdraw your consent at any time by:

- Clearing cookies in your browser settings
- Using your browser's private/incognito mode
- Opting out of Google Analytics via the [Google Analytics Opt-out Browser Add-on](#)
- Managing Meta advertising preferences via [Meta Privacy Settings](#)

Please note that declining cookies may affect some features of the Website.

6. Third-Party Services and Data Processors

We engage the following third-party processors and services. Each acts as a data processor on our behalf (or, in some cases, as an independent controller) and is subject to their own privacy policies:

Service	Provider	Purpose	Data Processed	Privacy Policy
Google Analytics 4	Google LLC (US)	Website analytics	IP address, usage data, device info	policies.google.com/privacy
Google reCAPTCHA	Google LLC (US)	Anti-spam / bot protection on contact form	IP address, browser fingerprint, interaction data	policies.google.com/privacy
Google Maps	Google LLC (US)	Embedded office location map	IP address, location (if permitted by browser)	policies.google.com/privacy
Meta Pixel	Meta Platforms Inc. (US)	Advertising and conversion tracking	IP address, browser data, browsing behaviour	facebook.com/privacy/explanation
GoDaddy	GoDaddy Operating Company LLC (US)	Website hosting and contact form processing	All data submitted via Website	godaddy.com/legal/agreements/privacy-policy

We do not sell your personal data to any third party.

7. International Data Transfers

Some of our third-party processors are based in the United States or other countries outside the United Kingdom and European Economic Area. These transfers are conducted under appropriate safeguards, including:

- **Standard Contractual Clauses (SCCs):** Where personal data is transferred to processors in countries without an adequacy decision, we rely on the International Data Transfer Agreements (IDTAs) approved by the ICO (for UK transfers) and the EU Commission-approved SCCs (for EU transfers).
- **Adequacy decisions:** Where the UK or EU has determined that the recipient country provides an adequate level of data protection.

Google LLC and Meta Platforms Inc. participate in data transfer frameworks and have implemented SCCs/IDTAs for cross-border data transfers. For further details, please refer to their respective privacy policies.

8. Data Retention

We retain personal data only for as long as necessary for the purposes set out in this policy, and in accordance with applicable legal, regulatory, accounting, or reporting obligations.

Specific retention periods:

- **Contact form enquiries:** 24 months from the date of last contact, after which data is securely deleted
- **Analytics data:** 14 months (Google Analytics 4 default data retention setting)
- **Cookie consent records:** 12 months
- **Server/access logs:** 90 days
- **Meta Pixel cookie data:** 90 days

Where we are required to retain data for longer periods (for example, to comply with legal obligations or to defend legal claims), we will do so and will notify you accordingly where required.

9. Data Security

We implement appropriate technical and organisational security measures to protect your personal data against unauthorised access, loss, destruction, or alteration. These measures include:

- HTTPS encryption across our Website (TLS)
- Access controls limiting data access to authorised personnel only
- Use of Google reCAPTCHA to prevent automated abuse of our contact form
- Regular review of our third-party processor agreements

No transmission of data over the internet is completely secure. While we take all reasonable steps to protect your data, we cannot guarantee the security of data transmitted to or from our Website.

In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify the Information Commissioner's Office (ICO) within 72 hours of becoming aware of the breach, as required by UK GDPR Article 33.

10. Your Rights Under UK GDPR / EU GDPR

If you are located in the United Kingdom or European Economic Area, you have the following rights in relation to your personal data:

- **Right of access** — You have the right to request a copy of the personal data we hold about you (a Subject Access Request).
- **Right to rectification** — You have the right to request correction of inaccurate or incomplete data.
- **Right to erasure** — You have the right to request deletion of your personal data in certain circumstances (the "right to be forgotten").
- **Right to restriction** — You have the right to request that we restrict the 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 have the right to receive your data in a structured, commonly used, machine-readable format.
- **Right to object** — You have the right to object to processing based on legitimate interests or for direct marketing purposes.
- **Right to withdraw consent** — Where we rely on consent as a lawful basis, you may withdraw it at any time. Withdrawal does not affect the lawfulness of processing before withdrawal.

To exercise any of these rights, please contact us at accounts@aprrisks.com. We will respond within **30 calendar days** of receipt of your request. We may ask you to verify your identity before processing your request.

If you are not satisfied with our response, you have the right to lodge a complaint with the **Information Commissioner's Office (ICO)**:

- Website: ico.org.uk
- Telephone: 0303 123 1113

11. Your Rights Under CCPA/CPRA (California Residents)

If you are a resident of California, you have the following additional rights under the California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA):

- **Right to know** — You have the right to request disclosure of the categories and specific pieces of personal information we have collected about you, the categories of sources, the business purpose, and the categories of third parties with whom it is shared.
- **Right to delete** — You have the right to request deletion of personal information we have collected from you, subject to certain exceptions.
- **Right to opt out of sale or sharing** — Where we share your personal information with third parties for advertising purposes (such as via the Meta Pixel), you have the right to opt out. To exercise this right, see "Your Privacy Choices" below or contact us at accounts@aprrisks.com.
- **Right to correct** — You have the right to request correction of inaccurate personal information.
- **Right to non-discrimination** — We will not discriminate against you for exercising your CCPA/CPRA rights.

Your Privacy Choices: California residents may opt out of the sharing of personal information with third parties for advertising purposes by contacting us at accounts@aprrisks.com with the subject line "Your Privacy Choices – Opt Out Request", or by managing your cookie preferences via the cookie banner on our Website.

We will respond to verified CCPA/CPRA requests within **45 calendar days**.

12. Children's Privacy

Our Website and services are not directed at individuals under the age of 18. We do not knowingly collect personal data from children. If you believe we have inadvertently collected data from a person under 18, please contact us at accounts@aprrisks.com and we will take steps to delete that information promptly.

13. Links to Third-Party Websites

Our Website may contain links to third-party websites, including our social media profiles (LinkedIn, Facebook, Instagram). This Privacy Policy applies only to aprrisks.com. We are not responsible for the privacy practices of any third-party websites and encourage you to review their privacy policies before providing any personal data.

14. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our data practices, legal requirements, or services. When we make material changes, we will update the "Effective Date" at the top of this policy. We encourage you to review this page periodically. Continued use of our Website following any changes constitutes your acknowledgment of the updated policy.

15. Contact Us

For any questions, concerns, or requests relating to this Privacy Policy or the processing of your personal data, please contact us:

APR Risks Ltd

124 City Road
London
EC1V 2NX
United Kingdom

Email: accounts@aprrisks.com

Website: aprrisks.com

Company Number: 17043744 (registered in England & Wales)

For complaints or concerns that we have been unable to resolve to your satisfaction, you may contact the Information Commissioner's Office (ICO) at ico.org.uk or by telephone on 0303 123 1113.