PaceLab Ltd Privacy and Data Protection Policy

PACELAB LTD

PRIVACY AND DATA PROTECTION POLICY

Effective from: 1st September 2026
Policy owner: PaceLab Ltd
Privacy contact: Ben Howe
Privacy email: info@pacelabglobal.com
Version: 1.0
Next review date: 1st September 2027

1. PURPOSE OF THIS POLICY

PaceLab Ltd is committed to protecting the privacy and personal information of participants, parents, carers, customers, coaches and other individuals who interact with PaceLab.

This policy explains:

• What personal information PaceLab collects
• Why PaceLab collects it
• How that information is used
• Who information may be shared with
• How information is protected
• How long information may be retained
• The rights individuals have in relation to their information
• How privacy concerns can be raised

This policy applies to PaceLab's UK operations and programmes.

2. WHO WE ARE

For the purposes of applicable data-protection law, PaceLab Ltd will normally be the data controller for personal information collected directly in connection with its programmes and services.

Company name: PaceLab Ltd
Company number: 11702887
Registered office: 9 High Street, Wellington, Somerset, TA218QT
Privacy contact: Ben Howe
Privacy email: info@pacelabglobal.com
Website: https://pacelabglobal.com

There may be circumstances where another organisation acts as an independent controller or joint controller in relation to particular information. Where relevant, this will be explained separately.

3. DATA PROTECTION FRAMEWORK

PaceLab will process personal information in accordance with applicable UK data-protection and privacy legislation, including:

- The UK General Data Protection Regulation
- The Data Protection Act 2018
- The Data (Use and Access) Act 2025 and amendments made by it
- The Privacy and Electronic Communications Regulations where applicable

PaceLab will seek to ensure that personal information is:

- Processed lawfully, fairly and transparently
- Collected for specified and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and kept reasonably up to date
- Retained only for as long as reasonably necessary
- Protected using appropriate security measures

4. WHOSE INFORMATION WE MAY COLLECT

PaceLab may process information relating to:

- Participants
- Prospective participants
- Children and young people
- Parents and carers
- Adult customers
- Coaches
- Contractors
- Volunteers
- Website users
- People making enquiries
- Partner organisation contacts
- Emergency contacts
- Other individuals involved in PaceLab programmes

5. INFORMATION WE MAY COLLECT

Depending on the nature of the relationship with PaceLab, we may collect information including:

Identity Information

- Name
- Date of birth
- Age
- Gender where relevant
- Athlete or participant ID

Contact Information

- Email address
- Telephone number
- Home address where required
- Parent or guardian contact information
- Emergency contact information

Participant Information

- School
- Cricket club
- County or academy involvement
- Playing experience
- Playing role
- Training history
- Programme enrolment
- Attendance records
- Programme preferences

Parent and Guardian Information

- Parent or guardian name
- Relationship to participant
- Contact details
- Communication preferences
- Parental responsibility or authority where relevant

Health and Medical Information

Where necessary for safe programme participation, PaceLab may collect information including:

- Relevant medical conditions
- Allergies
- Medication
- Injuries
- Previous significant injuries
- Current pain or physical limitations
- Relevant disabilities
- Additional support needs
- Emergency medical information

Performance and Athlete Development Information

This may include:

- Ball speed
- Bowling workloads
- Physical testing results
- Strength and power measurements
- Sprint data
- Jump data

• Accuracy information
• Technical assessments
• Biomechanical measurements
• Training programmes
• Coaching notes
• Athlete development targets
• Performance reports
• Progress assessments

Photography and Video

This may include:

• Bowling footage
• Batting footage
• Training footage
• Profiling footage
• Technical analysis video
• Photographs
• Marketing content where permission exists
• Online coaching recordings where applicable

Programme and Transaction Information

This may include:

• Programmes purchased
• Payment status
• Invoice records
• Estimates
• Refunds
• Credits
• Payment plans
• Booking information

PaceLab will not normally retain full payment card details where payments are processed securely by an external payment provider.

Communication Information

This may include communications through:

• Email
• SMS
• WhatsApp
• Telephone
• Customer relationship management systems
• Coaching platforms
• Online communities
• Forms and questionnaires

Safeguarding Information

Where necessary, PaceLab may process information relating to:

• Safeguarding concerns
• Welfare concerns
• Allegations
• Incident reports
• Low-level concerns
• Safeguarding referrals
• Communications with relevant authorities

Technical and Website Information

Depending on the systems used, PaceLab may collect:

• IP address
• Device information
• Browser information
• Website usage information
• Cookie information
• Login activity
• Platform usage data

6. INFORMATION ABOUT CHILDREN

A significant proportion of PaceLab participants are under 18.

PaceLab recognises that children's personal information requires particular care.

Where a participant is under 18, PaceLab will normally collect enrolment and programme information through, or with the involvement of, a parent or legal guardian.

PaceLab will seek to:

• Collect only information that is reasonably necessary
• Explain data use clearly
• Take account of the age and understanding of the child
• Apply appropriate security measures
• Avoid unnecessary publication of children's information
• Consider children's interests when relying on legitimate interests
• Provide appropriate opportunities for children to raise privacy concerns

For PaceLab UK Academy programmes, participants under 18 are required to have their onboarding completed or authorised by a parent or legal guardian unless PaceLab expressly states otherwise.

7. HOW WE COLLECT INFORMATION

PaceLab may collect personal information:

• Directly from participants
• From parents or carers
• Through enquiry forms
• Through onboarding questionnaires

• Through programme bookings
• During coaching and training
• Through performance testing
• Through video submissions
• Through coaching platforms
• Through payment systems
• Through email, WhatsApp or other communications
• From partner organisations where appropriate
• From schools, clubs or cricket organisations where there is an appropriate reason
• Through website and digital platform use
• From safeguarding or statutory organisations where necessary

8. WHY WE USE PERSONAL INFORMATION

PaceLab may use personal information for purposes including:

• Responding to enquiries
• Assessing programme suitability
• Registering participants
• Delivering coaching services
• Managing Academy programmes
• Providing individualised training
• Conducting athlete profiling
• Analysing performance
• Monitoring athlete development
• Communicating with participants and parents
• Managing attendance
• Processing payments
• Managing customer accounts
• Providing online coaching
• Maintaining health and safety
• Responding to medical emergencies
• Safeguarding children and adults at risk
• Investigating incidents or complaints
• Managing photography and video permissions
• Improving PaceLab programmes
• Managing coaches and staff
• Maintaining business records
• Complying with legal and regulatory obligations
• Protecting PaceLab's legal rights
• Sending marketing communications where permitted

9. LAWFUL BASES FOR PROCESSING

PaceLab will identify an appropriate lawful basis for its processing of personal information.

Depending on the purpose, this may include:

Contract

Where processing is necessary to provide a service that an individual has purchased or requested.

This may include:

• Processing bookings
• Delivering programmes
• Providing coaching
• Managing payments
• Providing reports
• Communicating about the service

Where the contractual relationship is with a parent rather than the child participant, another lawful basis may be used for the child's information where appropriate.

Legitimate Interests

PaceLab may process information where this is necessary for PaceLab's legitimate interests or those of another person, provided those interests are not overridden by the individual's rights and interests.

Examples may include:

• Operating and improving programmes
• Maintaining appropriate customer records
• Managing participant relationships
• Preventing misuse of services
• Maintaining security
• Managing appropriate business administration
• Understanding programme performance
• Certain communications with existing customers

Where children are involved, PaceLab will give additional consideration to their rights and interests.

Consent

PaceLab may rely on consent where appropriate.

Examples may include:

• Certain marketing communications
• Marketing photography and video
• Particular optional uses of information
• Certain processing of sensitive information where explicit consent is appropriate

Consent may be withdrawn where consent is the lawful basis relied upon.

Legal Obligation

PaceLab may process information where necessary to meet a legal obligation.

Vital Interests

Information may be processed where necessary to protect someone's life or physical safety in an emergency.

Recognised Legitimate Interests

Where applicable under current data-protection legislation, PaceLab may rely on a recognised legitimate interest for certain specific purposes such as safeguarding vulnerable individuals.

10. HEALTH AND OTHER SPECIAL CATEGORY INFORMATION

Information concerning a person's health is treated as special category personal information.

PaceLab may need health information to:

- Assess whether participation can be undertaken safely
- Make reasonable adjustments
- Understand relevant injuries
- Plan appropriate training
- Respond to medical emergencies
- Maintain participant welfare

PaceLab will identify both:

- An appropriate lawful basis for processing the personal information; and
- An appropriate condition for processing special category information

Depending on the circumstances, this may include explicit consent, vital interests, safeguarding provisions or another condition permitted by law.

Health information will only be made available to people who reasonably need access to it.

11. SAFEGUARDING INFORMATION

PaceLab may process personal information where necessary to safeguard children or adults at risk.

Safeguarding information may be particularly sensitive.

PaceLab may process and share safeguarding information without consent where obtaining consent is inappropriate, unreasonable or could place a person at greater risk, provided an appropriate legal basis exists.

Information may be shared with organisations including:

- Police
- Children's social care
- Adult safeguarding services
- Local Authority Designated Officers
- The Cricket Regulator
- ECB safeguarding personnel
- County or Recreational Cricket safeguarding personnel
- Schools
- Clubs
- Venues
- Other appropriate safeguarding organisations

Safeguarding information will be managed in accordance with the PaceLab Safeguarding and Child Protection Policy.

Where PaceLab relies on a legal condition requiring an Appropriate Policy Document, PaceLab will maintain the required internal documentation.

12. ATHLETE PERFORMANCE DATA

PaceLab collects and analyses athlete performance information as a central part of its coaching services.

This may include:

- Technical metrics
- Physical performance metrics
- Ball speed
- Movement information
- Bowling action measurements
- Workload information
- Training results
- Performance trends
- Coaching assessments

This information may be used to:

- Personalise training
- Identify areas for development
- Monitor progress
- Compare current and historical performance
- Develop training recommendations
- Generate participant reports
- Support coaching decisions

13. VIDEO AND BIOMECHANICAL ANALYSIS

PaceLab may collect and process video footage as part of its coaching and athlete-development services.

Footage may be used to:

- Analyse bowling technique
- Analyse batting technique
- Conduct biomechanical assessment
- Assess movement
- Provide coaching feedback
- Track development
- Compare performance over time

Coaching footage is separate from permission to use identifiable content publicly for marketing.

Public use is governed by the PaceLab Photography, Filming and Streaming Policy.

14. THIRD-PARTY TECHNOLOGY

PaceLab uses technology providers to help deliver its programmes and operate its business.

These may include providers used for:

- Customer relationship management
- Athlete management
- Coaching
- Video analysis
- Performance analysis
- Strength and conditioning
- Payment processing
- Email
- Messaging
- Website hosting
- Cloud storage
- Forms and surveys
- Accounting
- Performance testing

Current key providers may include:

- GoHighLevel
- Onform
- Volt
- PitchWolf
- Ludimos
- Output Sports

The exact systems used may change over time.

PaceLab will seek to ensure that appropriate arrangements are in place when service providers process personal information on PaceLab's behalf.

15. SHARING INFORMATION

PaceLab does not sell participant personal information.

PaceLab may share information where reasonably necessary with:

- Coaches and authorised staff
- Technology providers
- Payment providers
- Accountants and professional advisers
- Partner coaching organisations
- Schools or clubs where appropriate
- Venue operators where necessary
- Safeguarding organisations
- Insurers
- Legal advisers
- Regulators

• Police and statutory authorities
• Other organisations where required by law

Only information reasonably necessary for the relevant purpose should be shared.

16. PACELAB COACHES

PaceLab coaches may require access to participant information in order to provide appropriate coaching.

Depending on their role, this may include:

• Participant name
• Age
• Training history
• Relevant health information
• Injury information
• Performance data
• Training programme
• Coaching footage
• Attendance information
• Relevant parent contact information

Coaches should only access information required for their role.

17. PARTNER ORGANISATIONS

Some PaceLab programmes may be delivered with:

• Schools
• Cricket clubs
• Academies
• Coaching organisations
• Venues
• Specialist service providers

Where information needs to be shared with a partner, PaceLab will consider:

• Why the information needs to be shared
• What information is necessary
• Which organisation is responsible for the information
• Appropriate privacy arrangements
• Any contractual requirements

A partner organisation may sometimes act as an independent data controller for information it processes for its own purposes.

18. PITCHWOLF AND OTHER ANALYSIS PARTNERS

Where athlete information or video is shared with an approved analysis provider, participants should be informed of the purpose.

Information shared should be limited to what is reasonably required for:

• Technical analysis
• Performance assessment
• Report generation
• Athlete profiling
• Delivery of the relevant service

Where the third party wishes to use information for its own independent marketing or another separate purpose, an appropriate legal basis and privacy arrangement must exist.

19. INTERNATIONAL DATA TRANSFERS

Some PaceLab technology providers may process or store information outside the United Kingdom.

Where personal information is transferred internationally, PaceLab will seek to ensure that an appropriate legal mechanism or safeguard is in place where required.

This may include:

• Transfers to countries recognised as providing adequate protection
• Approved contractual protections
• The UK International Data Transfer Agreement
• The UK Addendum to approved contractual clauses
• Another legally permitted transfer mechanism

PaceLab will consider international transfers as part of its assessment of technology providers.

20. PAYMENT INFORMATION

Payments may be processed by external payment service providers.

PaceLab will normally receive information such as:

• Payment status
• Transaction amount
• Date of payment
• Customer name
• Relevant invoice or transaction reference

PaceLab should not retain full card details where these are processed by an approved external payment provider.

21. DIRECT MARKETING

PaceLab may send information about relevant programmes, services or opportunities where permitted by applicable law.

Marketing may be sent through channels such as:

• Email
• SMS

• WhatsApp
• Other appropriate communication platforms

Where consent is legally required, PaceLab will obtain appropriate consent.

Where another lawful basis is available, PaceLab will ensure the relevant requirements are met.

Individuals may opt out of marketing communications at any time.

Opt-out requests should be sent to:

info@pacelabglobal.com

or made using any unsubscribe function provided.

Operational communications about an active programme are not necessarily marketing and may still be sent where needed to deliver the service.

22. PHOTOGRAPHY AND MARKETING

Identifiable photographs or videos may be used for marketing where appropriate permission exists.

Possible uses include:

• Social media
• Website
• Brochures
• Advertising
• Promotional videos
• Case studies
• Programme communications

Marketing consent is separate from normal programme participation.

A participant will not be excluded from a programme merely because they decline marketing photography consent.

Further information is provided in the PaceLab Photography, Filming and Streaming Policy.

23. WITHDRAWING CONSENT

Where PaceLab relies on consent, that consent may be withdrawn.

Withdrawal does not make processing that took place before withdrawal unlawful.

Requests may be sent to:

info@pacelabglobal.com

Where marketing photography consent is withdrawn, PaceLab will take reasonable steps to prevent new use of the material and, where reasonably practicable, remove existing digital content under its control.

24. DATA ACCURACY

PaceLab will take reasonable steps to keep relevant personal information accurate.

Participants and parents are responsible for informing PaceLab where important information changes.

This is particularly important for:

- Contact information
- Emergency contacts
- Medical information
- Injuries
- Allergies
- Medication
- Parent or guardian information

Information may be updated through PaceLab's onboarding or account-management systems where available.

25. DATA SECURITY

PaceLab will take reasonable technical and organisational measures to protect personal information.

Measures may include:

- Password-protected systems
- Controlled user access
- Appropriate account permissions
- Secure cloud systems
- Multi-factor authentication where available
- Staff access controls
- Secure storage
- Data backup arrangements
- Appropriate provider selection
- Internal confidentiality expectations
- Removal of access when staff leave or change roles

Access to sensitive participant information should be limited to individuals with a legitimate need to know.

26. PERSONAL DEVICES

Staff and coaches should avoid unnecessarily storing participant information on personal devices.

Where personal devices are legitimately used for PaceLab activity:

• Appropriate security should be enabled
• Participant information should not be shared through inappropriate channels
• Sensitive information should not be retained unnecessarily
• Information should be moved to approved PaceLab systems where appropriate
• Access should be removed when no longer required

27. DATA BREACHES

A personal data breach may include:

• Information sent to the wrong person
• Lost or stolen devices containing personal information
• Unauthorised system access
• Accidental publication
• Loss of records
• Cybersecurity incidents
• Inappropriate disclosure of participant information

Staff and coaches must report suspected personal data breaches promptly to:

Privacy contact: Ben Howe
Email: info@pacelabglobal.com

PaceLab will assess the incident and take appropriate action.

Where legally required, PaceLab will notify the Information Commissioner's Office and affected individuals within applicable legal timescales.

28. RETENTION

PaceLab will not keep personal information for longer than reasonably necessary.

Retention periods will depend on:

• The purpose for which information was collected
• The participant's relationship with PaceLab
• Safeguarding requirements
• Legal and regulatory requirements
• Insurance requirements
• Financial and accounting requirements
• Potential legal claims
• Ongoing athlete-development value

PaceLab should maintain a more detailed internal retention schedule.

Suggested standard retention periods include:

Enquiry information where no programme is purchased: 2 Years

General customer and programme records: 6 Years

Financial and transaction records: Normally 6 Years

Participant onboarding records: Duration of Relationship + 6 Years

Coaching and technical analysis footage: Active relationship plus 2 years

Profiling and biomechanical footage: Active relationship plus 3 years

Performance tracking footage: Active relationship plus 3 years

Unused raw marketing footage: Up to 12 months

Marketing content selected for ongoing use: Up to 3 years before review

Online coaching recordings: Up to 90 days unless intentionally retained as part of the coaching record

Safeguarding information: In accordance with PaceLab's safeguarding retention requirements

Marketing contact information: Until consent is withdrawn, the individual objects, or the information is no longer reasonably required, subject to keeping an appropriate suppression record where necessary

PaceLab may retain information for longer where there is a specific legal, safeguarding, insurance or dispute-related reason.

29. DELETION AND ANONYMISATION

At the end of the relevant retention period, information should be:

- Securely deleted
- Destroyed
- Anonymised
- Or reviewed and retained only where there is a documented reason for continued retention

Information held within secure backup systems may not be capable of immediate individual deletion but should not ordinarily be restored or used except as part of legitimate backup recovery procedures.

30. INDIVIDUAL RIGHTS

Depending on the circumstances and applicable law, individuals may have rights including:

- The right to be informed about how their information is used
- The right to access personal information
- The right to correct inaccurate information
- The right to request deletion in certain circumstances
- The right to restrict processing in certain circumstances
- The right to object to certain processing
- The right to data portability in certain circumstances
- Rights relating to automated decision-making where applicable
- The right to withdraw consent where consent is relied upon

These rights are not absolute and may not apply in every circumstance.

31. ACCESS REQUESTS

Individuals may request access to personal information PaceLab holds about them.

Requests should be sent to:

Privacy contact: Ben Howe
Email: info@pacelabglobal.com

PaceLab may need to confirm the identity of the person making the request before releasing information.

Where a parent requests information about a child, PaceLab will consider the child's age, understanding, privacy rights and the circumstances of the request.

32. CHILDREN'S DATA RIGHTS

Children have data-protection rights in their own right.

As children become older and more capable of understanding how their information is used, PaceLab will take their views and privacy rights increasingly into account.

A parent's authority to act on behalf of a child will therefore be considered in light of:

- The child's age
- Their understanding
- The nature of the information
- The purpose of the request
- Safeguarding considerations

33. REQUESTS FOR DELETION

Individuals may request deletion of their information in certain circumstances.

PaceLab may not be able to delete information where there is a valid reason to retain it.

This may include:

- Legal requirements
- Safeguarding records
- Financial records
- Establishment, exercise or defence of legal claims
- Information required to manage an ongoing dispute
- Another lawful reason for continued retention

Where information cannot be deleted, PaceLab will explain this where appropriate.

34. AUTOMATED DECISION-MAKING AND AI

PaceLab may use technology to assist with:

- Athlete profiling
- Performance analysis

• Training recommendations
• Technical assessment
• Administrative workflows

PaceLab does not intend to make significant decisions about participants solely through automated processing without appropriate safeguards.

Where PaceLab introduces technology that makes solely automated decisions producing legal or similarly significant effects, appropriate safeguards will be applied in accordance with applicable law.

PaceLab coaching decisions should normally involve appropriate human judgement.

35. ARTIFICIAL INTELLIGENCE

PaceLab may use artificial intelligence or machine-assisted technology as part of coaching, analysis or business operations.

Where personal information is processed through such systems, PaceLab will consider:

• The purpose of processing
• The information being used
• The technology provider
• Security
• Accuracy
• Participant privacy
• Children's interests
• Appropriate human oversight
• Any applicable data-protection requirements

PaceLab staff must not upload confidential participant information into unapproved public artificial-intelligence systems without appropriate authorisation.

36. COOKIES AND WEBSITE TECHNOLOGY

PaceLab's website may use cookies and similar technologies.

These may be used for purposes including:

• Essential website functionality
• Security
• Analytics
• Remembering preferences
• Marketing where permitted

Where legally required, users will be given appropriate choices regarding non-essential cookies.

More detailed information may be provided in a separate Cookie Policy.

37. CONFIDENTIALITY

PaceLab expects staff, coaches and contractors to respect the confidentiality of personal information.

Information about participants should not be discussed unnecessarily with:

• Other parents
• Other participants
• Unauthorised coaches
• Friends or family members
• External organisations

Information should only be shared where there is an appropriate operational, legal or safeguarding reason.

38. SAFEGUARDING OVERRIDES NORMAL CONFIDENTIALITY

PaceLab cannot promise absolute confidentiality where information indicates that:

• A child may be at risk
• An adult at risk may be at risk
• Another person may be in danger
• A serious safeguarding concern exists

Where necessary and lawful, information may be shared with appropriate safeguarding or statutory organisations without the consent of the participant or parent.

Further details are contained within PaceLab's Safeguarding and Child Protection Policy.

39. COMPLAINTS ABOUT PERSONAL INFORMATION

Anyone with concerns about how PaceLab has handled their personal information should initially contact:

Privacy contact: Ben Howe
Email: info@pacelabglobal.com

PaceLab will seek to investigate and respond appropriately.

Individuals also have the right to raise concerns with the UK's data-protection regulator, the Information Commissioner's Office.

Information Commissioner's Office
Website: www.ico.org.uk

40. DATA PROTECTION COMPLAINT PROCEDURE

Where PaceLab receives a complaint concerning its processing of personal information, PaceLab will:

1. Record the complaint.
2. Acknowledge it appropriately.
3. Review the relevant processing.
4. Gather information necessary to understand the concern.

5. Respond to the individual.
6. Take corrective action where appropriate.
7. Record the outcome.
8. Cooperate with the Information Commissioner's Office where required.
9. STAFF TRAINING AND RESPONSIBILITY

Relevant PaceLab staff should receive appropriate guidance or training concerning:

• Confidentiality
• Secure handling of participant information
• Safeguarding information
• Health information
• Photography and video
• Data breaches
• Individual rights
• Appropriate use of digital systems

Anyone with access to personal information is responsible for handling it appropriately.

42. DATA PROTECTION BY DESIGN

Where PaceLab introduces a new:

• System
• Programme
• App
• Technology provider
• Data collection process
• Performance-analysis tool
• Artificial-intelligence system

PaceLab should consider privacy and data protection during the planning stage rather than after implementation.

Where processing is likely to create a high risk to individuals, PaceLab will consider whether a Data Protection Impact Assessment is required.

43. THIRD-PARTY CONTRACTS

Where another company processes personal information on PaceLab's behalf, PaceLab should ensure an appropriate contractual arrangement exists where required.

PaceLab should consider:

• Confidentiality
• Security
• Permitted processing
• Data retention
• Data deletion
• International transfers
• Sub-processors
• Data breaches
• Assistance with individual rights

44. CHANGES TO THIS POLICY

PaceLab may update this policy where:

• Data-protection law changes
• Regulatory guidance changes
• PaceLab introduces new systems
• PaceLab introduces new programmes
• Data-processing practices change
• New technology is introduced
• Operational experience identifies a need for improvement

Where a change materially affects how existing participant information is used, PaceLab will provide appropriate information about that change.

45. RELATIONSHIP WITH OTHER PACELAB POLICIES

This policy should be read alongside:

• PaceLab Programme Terms and Conditions
• PaceLab Safeguarding and Child Protection Policy
• PaceLab Participant and Parent/Carer Code of Conduct
• PaceLab Health and Safety Policy
• PaceLab Photography, Filming and Streaming Policy
• PaceLab Cookie Policy where applicable
• Relevant participant consent and onboarding forms

46. KEY CONTACTS

PaceLab Ltd

Registered office: 9 High Street, Wellington, Somerset, Ta218QT
Company number: 11702887

Privacy and Data Protection

Name/Role: Ben Howe
Email: info@pacelabglobal.com
Telephone: 07557768663

Safeguarding

Designated Safeguarding Lead: Ben Howe
Email: b.howe@pacelabglobal.com

Information Commissioner's Office

Website: www.ico.org.uk

47. POLICY REVIEW

Policy owner: PaceLab Ltd
Privacy lead: [Ben Howe

Approved by: Steffan Jones
Effective date: 1st September 2026
Next review date: 1st September 2027

This policy will be reviewed at least annually or sooner where:

- Relevant legislation changes
- Regulatory guidance changes
- PaceLab's data use changes materially
- A significant data incident occurs
- A new technology or processing activity is introduced