



Unigold 2000 Limited – UK GDPR Statement

Updated: February 2026

This statement sets out how we comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. It replaces prior versions that referenced the EU GDPR and updates terminology, fines, and transfer mechanisms to current UK law.

Who we are

Unigold 2000 Limited is registered in England and Wales. Company number: 03225642.

Registered office: 256 High Street, Guildford, Surrey, GU1 3JG

ICO registration number: Z2857312.

Data Protection Officer (DPO): Matthew Gaskin (contact details in our Privacy Notice).

UK GDPR principles we follow

- Lawfulness, fairness and transparency – we identify a valid lawful basis, process fairly and explain processing in clear privacy information.
- Purpose limitation – we process personal data for specified, explicit purposes and do not use it in ways incompatible with those purposes.
- Data minimisation – we collect only what is necessary for each purpose.
- Accuracy – we take reasonable steps to keep personal data accurate and up to date.
- Storage limitation – we keep personal data for no longer than necessary.
- Integrity and confidentiality – we secure personal data using appropriate technical and organisational measures.

Regulatory framework and penalties

We are subject to the UK GDPR and the Data Protection Act 2018, enforced by the Information Commissioner's Office (ICO). The UK regime provides for maximum administrative fines of the higher of £17.5 million or 4% of worldwide annual turnover for certain infringements, and the higher of £8.7 million or 2% for others.

Our data protection programme

Since 2017 we have run a rolling compliance programme. Key controls include:

- Training and awareness for all staff, including induction and periodic refreshers; confidentiality obligations in contracts.
- Records of Processing Activities (ROPA) covering the systems and services we operate for ourselves and on behalf of clients.
- Data mapping of client and internal personal data, including data flows and locations.
- Data Protection Impact Assessments (DPIAs) for higher-risk processing (e.g., monitoring, CCTV, security tooling).
- Third-party management: due diligence and data processing terms with suppliers (e.g., Microsoft, Sophos, Copy Solutions, Cadline, helpdesk and remote support platforms).
- Information security measures: device encryption, access controls, secure storage of media, vulnerability and patch management, and incident response.
- Retention and deletion schedules aligned to contractual and legal requirements.
- Data subject rights process covering access, rectification, erasure, restriction, objection and portability, with response targets within one month.
- Marketing controls under PECR for electronic marketing and consent where required.
- International transfers governed by the UK International Data Transfer Agreement (IDTA) or UK Addendum to the EU Standard Contractual Clauses, as applicable.

Lawful bases we rely on

Depending on the processing activity, we rely on:

- Contract – to provide IT services, fulfil support requests, and administer accounts and billing;
- Legal obligation – to comply with UK law (e.g., tax, accounting, security obligations) and respond to lawful requests;
- Legitimate interests – to operate, secure and improve our services, including network monitoring and cybersecurity, balanced against your rights;
- Consent – for certain marketing communications and optional services, which you can withdraw at any time.

Further information

Full details of our processing, retention periods, processors, international transfers and how to exercise your rights are set out in our Privacy Notice available at [Unigold GDPR Privacy Notice.pdf](#).