Privacy Policy

Introduction

MXVI is a specialist provider of mission-critical vehicle intelligence and communication systems, designed to support public safety, emergency services and other critical users operating in demanding and regulated environments. MXVI is committed to protecting the privacy, confidentiality and security of personal data and to processing personal information fairly, lawfully and transparently in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This Privacy Policy explains how MXVI collects, uses, stores, protects and shares personal data and outlines the rights available to individuals whose information we process.

1. Scope

This policy applies to:

- Customers.
- Prospective customers.
- Suppliers and business partners.
- Website users.
- Employees and contractors.
- Other individuals whose personal data may be processed by MXVI.

2. Personal Data We Collect

Depending on the nature of our relationship with you, MXVI may process:

- Contact details.
- Business and employment information.
- Account information.
- Transaction and payment information.
- Service and support records.
- Website usage and analytics data.
- Marketing preferences.
- Recruitment information.
- Security and audit log information.

3. Lawful Basis for Processing

MXVI processes personal data under one or more of the following lawful bases:

- Performance of a contract.
- Compliance with legal obligations.
- Legitimate business interests.
- Consent where required.
- Protection of vital interests where applicable.

4. How We Use Personal Data

We may use personal data to:

- Deliver products and services.
- Manage customer relationships.
- Provide technical support.
- Manage contracts and suppliers.
- Monitor service performance.
- Maintain information security.
- Meet legal and regulatory requirements.
- Improve our products and services.
- Communicate with customers and stakeholders.

5. Data Sharing

MXVI may share personal data with:

- Technology partners.
- Vehicle manufacturers.
- System integrators.
- Communication service providers.
- Professional advisers.
- Auditors.
- Regulatory bodies.
- Law enforcement agencies where legally required.

All such sharing is conducted under appropriate contractual, security and confidentiality controls.

6. International Transfers

Where personal data is transferred outside the United Kingdom, MXVI will implement appropriate safeguards including:

- UK Adequacy Regulations.
- UK International Data Transfer Agreements (IDTA).

- Approved contractual safeguards.
- Risk assessments where required.

7. Information Security

MXVI operates a secure-by-design approach and maintains appropriate technical and organisational measures to protect personal data from accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

MXVI's information security controls are aligned with recognised industry good practice, including the principles contained within ISO/IEC 27001 Information Security Management Systems (ISMS) and applicable UK Government security expectations.

These measures may include:
• Role-based access controls.
• Multi-factor authentication.
• Encryption technologies.
• Endpoint protection and device security controls.
• Secure backup and disaster recovery arrangements.
• Security monitoring and audit logging.
• Vulnerability management and patching processes.
• Information classification and handling procedures.
• Supplier assurance and due diligence activities.
• Security awareness and data protection training.

MXVI is committed to continuously reviewing and improving its information security arrangements to support the confidentiality, integrity and availability of information assets and personal data.

7.1 Information Security Governance

MXVI recognises that effective information security governance is fundamental to protecting customer, employee and business information.

MXVI is committed to:
• Maintaining documented information security policies and procedures.
• Identifying and managing information security risks.
• Applying security controls proportionate to identified risks.
• Monitoring compliance with legal, regulatory and contractual requirements.
• Supporting continual improvement of information security controls.
• Promoting security awareness throughout the organisation.
• Reviewing information security performance on a regular basis.

Where appropriate, MXVI seeks to align its security management practices with the requirements and principles of ISO/IEC 27001 and other recognised security frameworks used within government and critical national infrastructure environments.

8. Retention of Personal Data

MXVI retains personal data only for legitimate business, contractual, regulatory and legal purposes.

Typical retention periods include:

- Customer records – 7 years after contract completion.
- Financial records – 7 years.
- Supplier records – 7 years after contract completion.
- Recruitment records – 12 months for unsuccessful applicants.
- Website enquiries – 2 years.
- Security logs – 12 months.
- Incident records – 7 years after closure.

At the end of the retention period, information is securely deleted, anonymised or destroyed.

9. Individual Rights

Individuals have the right to:

- Access their personal data.
- Correct inaccurate information.
- Request deletion where applicable.
- Restrict processing.
- Object to processing.
- Request data portability.
- Withdraw consent where consent is the lawful basis.

Requests will be handled in accordance with applicable legal requirements.

10. Personal Data Breaches

MXVI maintains procedures for identifying, investigating and managing personal data breaches.

Where required by law, MXVI will:

- Notify the Information Commissioner's Office (ICO).
- Notify affected individuals.
- Take appropriate remedial action.

11. Government and Public Sector Customers

MXVI supports customers operating within government, public safety and other regulated environments.

Where MXVI acts as a Data Processor on behalf of customers, personal data will only be processed in accordance with:

- Contractual obligations.
- Customer instructions.
- Applicable legislation.
- Information assurance requirements.

12. Training and Awareness

MXVI recognises that effective privacy management requires employee awareness.

We are committed to:

- Promoting data protection awareness.
- Supporting secure working practices.
- Providing appropriate training.
- Encouraging prompt reporting of security concerns.

13. Contact Details

For privacy-related enquiries or requests concerning personal data:

MXVI
Website: www.mxvi.net
Email: info@mxvi.net

Individuals also have the right to contact the Information Commissioner's Office (ICO).

Future Actions

MXVI will continue to strengthen its privacy and data protection framework by:

- Reviewing policies annually.
- Enhancing supplier assurance processes.
- Monitoring regulatory developments.
- Improving security controls where appropriate.
- Maintaining alignment with public sector procurement expectations.
- Supporting secure and compliant service delivery.

Approval

This Privacy Policy has been approved by the Directors of MXVI and is reviewed periodically to ensure it remains appropriate to the size, nature and activities of the business.

The Directors have overall responsibility for ensuring that MXVI maintains appropriate systems, controls and governance arrangements relating to data protection and privacy compliance.

Signed on behalf of MXVI.

Steve Keogh
Chairman

Signature: _____Steve Keogh_____

Date: _____09/01/2026_____