

# DATA PROTECTION AND PRIVACY POLICY

**Effective Date:** 01 January 2027

**Applies to:** CPU Close Protection Unit Ltd (UK), CPU Consult Limited (Kenya), CPU Africa Ltd (Kenya) and CPU Eastern Africa Limited (Kenya)

**Last Reviewed:** 01 January 2026

**Next Review Date:** 01 March 2026

## 1. INTRODUCTION

This Data Protection and Privacy Policy (“Policy”) explains how **CPU Close Protection Unit Ltd** (Company Registration: [UK Reg. Number], based in the United Kingdom) and **CPU Consult Limited** (Company Registration: [Kenya Reg. Number], based in Nairobi, Kenya), and **CPU Africa HQ Limited** (Company Registration: [Kenya Reg. Number], based in Nairobi, Kenya) and ) and **CPU Eastern Africa Limited** (Company Registration: [Kenya Reg. Number], based in Nairobi, Kenya) collect, use, disclose, transfer, and store personal data in compliance with:

- The **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**; and
- The **Kenya Data Protection Act, 2019 (DPA 2019)**.

We are committed to safeguarding the privacy of our trainees, clients, staff, contractors, and partners across all our global operations.

## 2. DATA CONTROLLERS

- **CPU Close Protection Unit Ltd (UK)**  
Address: 35A Hall Lane, London, United Kingdom, E4 8HH  
Email: [info@closeprotectionunit.com](mailto:info@closeprotectionunit.com)
- **CPU Consult Limited (Kenya)**  
Address: PO Box.: 13490, Nairobi, Limuru road, City Square, Kenya  
Email: [info@closeprotectionunit.com](mailto:info@closeprotectionunit.com) / [kkunit@yahoo.com](mailto:kkunit@yahoo.com)  
Office of the Data Protection Commissioner (ODPC)
- **CPU Africa HQ Limited (Kenya)**  
Address: PO Box.: 13490, Nairobi, Limuru road, City Square, Kenya  
Email: [info@closeprotectionunit.com](mailto:info@closeprotectionunit.com) / [cpu.ask@gmail.com](mailto:cpu.ask@gmail.com)  
Office of the Data Protection Commissioner (ODPC)
- **CPU Eastern Africa Limited (Kenya)**  
Address: PO Box.: 13490, Nairobi, Limuru road, City Square, Kenya

Email: [info@closeprotectionunit.com](mailto:info@closeprotectionunit.com) / [cpu.ask@gmail.com](mailto:cpu.ask@gmail.com)

Office of the Data Protection Commissioner (ODPC)

All entities are **independent data controllers** and responsible for the lawful processing of personal data under their respective jurisdictions.

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### 3. SCOPE

This Policy applies to all personal data that we collect, whether in physical or digital form, including but not limited to:

- Trainee records and course registration data
- Staff employment and vetting records
- Client security assessments and consultancy details
- Biometric data (where applicable during training or field deployment)
- Surveillance data (CCTV, access logs in secure facilities)
- Website and communication data
- International partner or investor information

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### 4. PRINCIPLES OF DATA PROCESSING

We adhere to the following core principles as required under UK GDPR and Kenya's DPA 2019:

- **Lawfulness, fairness, and transparency**
- **Purpose limitation**
- **Data minimisation**
- **Accuracy**
- **Storage limitation**
- **Integrity and confidentiality**
- **Accountability**

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### 5. TYPES OF PERSONAL DATA COLLECTED

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

<b>Data Type</b>	<b>Examples</b>
Identification Data	Full name, ID/passport number, date of birth
Contact Details	Phone number, email address, physical address
Employment/Vetting Data	CVs, background checks, training records
Health & Safety Data	Medical declarations, injury logs
Financial Data	Payment receipts, bank details (where required)

Data Type	Examples
Technical Data	IP addresses, log files, device/browser info
Biometric Data (where used)	Facial recognition data, fingerprints (only in secured areas)

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## 6. LEGAL BASIS FOR PROCESSING

We process personal data based on the following legal grounds:

- **Consent:** Where individuals have clearly agreed to the processing.
  - **Contractual necessity:** To perform our obligations under a training or consultancy contract.
  - **Legal obligation:** To comply with regulatory, tax, or governmental requirements.
  - **Legitimate interests:** For business administration, risk management, or marketing (where rights are not overridden).
  - **Public interest or vital interests:** In emergency or life-threatening circumstances.
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## 7. DATA SUBJECT RIGHTS

Under both the UK GDPR and the Kenyan DPA 2019, individuals have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request deletion ("right to be forgotten")
- Restrict processing
- Object to processing (including marketing)
- Withdraw consent (where applicable)
- Lodge a complaint with the **UK Information Commissioner's Office (ICO)** or **Kenya's Office of the Data Protection Commissioner (ODPC)**

To exercise any rights, please contact:

✉ [info@closeprotectionunit.com](mailto:info@closeprotectionunit.com)

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## 8. DATA SECURITY

We implement appropriate **technical and organizational measures (TOMs)** to ensure the confidentiality, integrity, and availability of personal data. These include:

- Role-based access control (RBAC)
- Encryption of data at rest and in transit
- Secure file storage (cloud and on-premises)
- Firewall and intrusion detection systems
- Data loss prevention and access monitoring

- Secure paper records management (locked cabinets, access logs)

Staff and contractors are regularly trained on data protection obligations.

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## 9. INTERNATIONAL TRANSFERS

Where personal data is transferred across borders (e.g., from Kenya to the UK or vice versa), we ensure that:

- Adequate safeguards are in place (such as Standard Contractual Clauses or adequacy decisions).
- The data subject is informed about the transfer and its justification.

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## 10. DATA RETENTION

We retain personal data only for as long as necessary to fulfil the purpose for which it was collected. The standard retention periods are:

<b>Data Type</b>	<b>Retention Period</b>
Trainee Records	5 years from course completion
Employee Records	6 years post-employment
Client Data	7 years after contract end
Financial/Invoice Data	7 years (UK HMRC & Kenya KRA requirement)
CCTV/Access Logs	30–90 days unless under investigation

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## 11. THIRD-PARTY PROCESSORS

We use trusted third-party service providers for:

- Email and cloud storage (Microsoft 365, Google Workspace)
- Payment processing (Stripe, Mpesa, or local bank integrations)
- CRM and marketing systems (e.g., Mailchimp, Zoho)

All third-party processors are subject to **data processing agreements (DPAs)** and must comply with our data protection standards.

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## 12. DATA BREACH NOTIFICATION

In the event of a **personal data breach**:

- We will assess the severity within **72 hours** of detection.
- Notify the **ICO (UK)** or **ODPC (Kenya)** if there is a risk to individual rights.
- Inform affected individuals where there is a high risk of harm.
- Investigate and document remedial actions taken.

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## 13. CHILDREN'S DATA

We do not knowingly collect data from individuals under the age of **18**, unless for specific educational training with **verified parental/guardian consent**.

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## 14. MONITORING & CCTV

For security reasons, some of our training venues and offices are equipped with CCTV. This footage is:

- Used solely for security, safety, and incident investigation
- Stored securely for 30–90 days
- Not shared with third parties unless legally required

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## 15. POLICY UPDATES

This Policy may be updated periodically to reflect changes in the law, technology, or operational needs. Updated versions will be published on our websites:

- [www.cpu-hq.com](http://www.cpu-hq.com)

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## 16. CONTACT US

If you have questions, complaints, or wish to exercise your rights, contact:

**CPU Close Protection Unit Ltd (UK)**  
Email: [info@closeprotectionunit.com](mailto:info@closeprotectionunit.com)

**CPU Consult Limited (Kenya)**  
Email: [kkunit@yahoo.com](mailto:kkunit@yahoo.com)  
Phone: +254115283589

You may also contact:

- **UK ICO:** [www.ico.org.uk](http://www.ico.org.uk) | Phone: +44 303 123 1113

- Kenya ODPC: [www.odpc.go.ke](http://www.odpc.go.ke) | Phone: +254 703 999 999



**Krisztian Korom**

CPU Close Protection Unit Ltd / England – CEO and Founder

CPU Consult Limited / Kenya – CEO and Founder

CPU Africa HQ Ltd. / Kenya – CEO and Founder

CPU Eastern Africa Limited / Kenya – CEO and Founder

International Bodyguard and Security Services Association – Representative  
/Instructor

Haqfield Qualifications – Course Director and Representative

IBSSA Africa Section Coordinator

ITI International Tactical Instructor

ISA International Security Association President (China)

HABC Instructor

IAPA Representative, Instructor and Africa Section Coordinator

IPA member