



SIMPLICITYHUB LTD

DATA PROTECTION POLICY

Effective date: 10 March 2026 • Review date: 10 March 2027

1. Purpose and scope

This Data Protection Policy explains how SimplicityHub Ltd manages and protects personal data in connection with its website, customer portal, downloads, digital products, online Academy, software and related services. It is intended to operate alongside the company's Privacy Policy, Cookie Policy and Terms of Service. The policy is proportionate to the size and nature of SimplicityHub Ltd as an owner-operated online education and digital products business.

2. Data protection framework

SimplicityHub Ltd processes personal data in accordance with applicable UK data protection law, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The company is registered with the Information Commissioner's Office (ICO) under registration reference ZC215752 and pays the annual data protection fee as required under the Data Protection (Charges and Information) Regulations 2018.

3. Personal data processed

Depending on how a person uses SimplicityHub services, the company may process contact details such as name and email address; account and access information including login details stored in a secure format and products linked to an account; transaction and fulfilment information including purchase records, product access status and payment confirmations; technical and usage information such as IP address, browser type, device information, pages viewed and general usage patterns; and communications submitted through forms, email or support requests.

4. Purposes and lawful bases

Personal data is used to provide digital products, downloads and customer workspaces; process purchases and fulfil orders; send transactional emails such as account messages, password resets, access emails and purchase confirmations; respond to enquiries and support requests; monitor basic performance, security and service reliability; and comply with legal, regulatory or tax obligations. Depending on the processing, SimplicityHub relies on contract, legitimate interests, consent, or legal obligation as the applicable lawful basis.

5. Data minimisation and accuracy

SimplicityHub Ltd will seek to collect and use personal data that is relevant to the purposes for which it is processed and will avoid collecting unnecessary information. Information should be kept accurate and corrected where an inaccuracy is identified or reported.

6. Security and access control

SimplicityHub Ltd uses reasonable administrative, technical and organisational measures designed to protect personal data. Access to personal data is limited to authorised access necessary for operating and supporting the services. Account credentials are expected to be kept secure. No online service can guarantee absolute security, so the company will take proportionate steps to identify, respond to and reduce security risks.

7. Third-party processors and service providers

SimplicityHub Ltd may share personal data where needed with trusted service providers supporting hosting, payment processing, email delivery, analytics, security or technical support. Payments are processed by third-party providers such as Stripe and SimplicityHub does not store full card details on its own systems. Service providers will be considered according to the nature of the service and the data involved.



8. Cookies, analytics and advertising

SimplicityHub uses cookies and similar technologies for essential operation, functional preferences, analytics/performance and, where enabled and lawful, communication or marketing purposes. Non-essential cookies are subject to consent through the cookie preference mechanism. Google Ads and Google Analytics are among the services identified in the company's published privacy/cookie information. Users can reject non-essential cookies or change their preferences.

9. AI Coach and AI-enabled services

Some SimplicityHub products, including the Academy, include an AI Coach feature. Messages sent to the AI Coach and the AI replies may be stored for up to 90 days and then automatically deleted. Anonymous usage counts may be retained longer for billing reconciliation and service monitoring. Access to retained AI Coach messages is restricted to authorised administrators. Users are instructed not to submit sensitive personal data, health information, commercial secrets or third-party data into the AI Coach. The Terms of Service state that AI features do not make decisions about individuals, are not used for profiling, scoring or automated decision-making affecting individuals' rights, and that user data is sent to the AI provider only when an AI feature is explicitly used.

10. Data retention and deletion

Personal data is retained only for as long as reasonably needed for account management, purchase records, customer support, platform security and legal or accounting obligations. Specific retention periods may apply to particular services; for example, AI Coach message text is retained for up to 90 days. Dormant customer accounts may be deleted after more than six months without login activity in accordance with the Terms of Service, subject to the provisions stated there.

11. Individual rights

Depending on applicable law, individuals may have rights to request access to personal data, correction of inaccurate data, deletion in certain circumstances, restriction of processing, objection to certain processing, and data portability where applicable. Requests should be made through the company's contact route. Individuals also have the right to complain to the ICO.

12. Data breaches and incidents

Any suspected loss, unauthorised access, disclosure, alteration or destruction of personal data should be treated as a data-protection incident and escalated to the owner/director promptly. The incident should be assessed, contained where possible, documented and, where required by applicable law, notified to the ICO and/or affected individuals within the applicable timescales.

13. Data protection by design

When introducing or materially changing a product, feature, supplier or processing activity, SimplicityHub Ltd will consider privacy and data-protection requirements at an appropriate stage. Considerations may include the type and amount of personal data involved, the purpose and lawful basis, access controls, retention, third-party processing, security and the rights of individuals.

14. Records and accountability

SimplicityHub Ltd will maintain appropriate records and documentation for a business of its size and activities, including this policy, its Privacy Policy, Cookie Policy and relevant supplier/service arrangements. The company will review its data-processing practices when services or suppliers change and will update its documentation where necessary.

15. Responsibilities

Overall responsibility for data protection rests with the owner/director of SimplicityHub Ltd. As an owner-operated business, the company's data protection responsibilities are managed directly by the owner/director, with specialist or technical support obtained where appropriate.

16. Related documents and public information



This policy should be read together with the SimplicityHub Privacy Policy, Cookie Policy and Terms of Service. The public Privacy Policy describes the personal data collected, purposes of processing, lawful bases, payments, sharing, retention, AI Coach processing, individual rights and security measures. The Cookie Policy describes cookie categories and consent choices. The Terms of Service contain provisions relating to accounts, payments, AI, privacy and cookies, as well as the public certificate register and course feedback provisions.

17. Review and approval

This policy takes effect on 10 March 2026 and will be reviewed at least annually, or sooner if there is a material change to the business, processing activities, suppliers, relevant technology or applicable law. Next scheduled review: 20 march 2027.

Approval

Approved by: Owner / Director, SimplicityHub Ltd

Date: 10 March 2026