

Privacy Policy

1. Purpose

CKBR China Consultancy ("we," "us," or "our") is the trading name of CKBR Property Limited (Company No: 14595560). The company is a UK-registered consultancy firm providing high-fidelity supply chain intelligence. This policy governs how personal data is collected via our digital platforms and by our operatives in the People's Republic of China (PRC). It adheres to the UK Data (Use and Access) Act 2025 (DUAA) and China's Personal Information Protection Law (PIPL).

2. Dual-Jurisdiction Compliance

We operate under a "High-Water Mark" principle to ensure global compliance:

UK GDPR & DUAA 2025: Governs all data stored, processed, and accessed via our UK/EU servers.

China PIPL: Governs the initial collection and the "export" of personal information from the PRC to the UK.

3. Lawful Basis for Processing

In accordance with Section 70 of the DUAA 2025, we process personal data under the following grounds:

Recognised Legitimate Interests: We process data for crime prevention and detection, specifically to identify fraudulent suppliers and protect the UK supply chain. Under this "recognised" category, we are not required to perform a balancing Legitimate Interests Assessment (LIA).

Contractual Necessity: To perform services, process inquiries via website contact forms, and facilitate secure transactions via our online payment portals.

Consent: For marketing communications and non-essential website cookies, which can be withdrawn at any time.

4. Data Collection

We collect data through the following touchpoints:

Website Contact Forms: We collect names, email addresses, and company details to respond to service inquiries.

Online Payment Portals: We process financial transaction data to fulfill service orders. Note: To ensure security, sensitive cardholder data is processed by PCI-DSS compliant third-party gateways; CKBR does not store full credit card numbers on its own servers.

Field Operations: Professional data (names, titles, contact info) collected during on-site factory audits in China.

Commercial Research: Under Section 67 of the DUAA, we may process pseudonymized data for commercial research into supply chain trends.

Under **Article 28 of the PIPL**, we may process Sensitive Personal Information (SPI) such as specific financial IDs, bank account details, or government-issued identification, where there is a **strict necessity** for the performance of a supply chain audit or fraud investigation. We apply heightened security measures to SPI, including encryption at rest and strictly limited human access. We only process SPI where the benefit to the safety and integrity of the UK supply chain outweighs the potential impact on the individual's privacy.

5. Online Payment Gateways & Financial Data

Financial transactions on our site are processed via industry-standard third-party gateways (e.g., Stripe, PayPal, or equivalent). These processors are independent Data Controllers. The company does not receive, store, or process your full credit card number or CVV. These gateways are PCI DSS compliant and utilise their own fraud-prevention signaling. In accordance with the DUAA 2025, the company is not liable for data breaches or technical errors originating within the systems of these third-party payment providers. Your financial data is governed exclusively by the privacy policies of the respective payment processor.

6. Cross-border Transfers

Under Article 39 of the PIPL, we export personal data from China to the UK.

The Data Protection Test: In compliance with Section 85 of the DUAA 2025, The company confirms that the level of protection for data subjects in the UK is "not materially lower" than the standard provided under UK law.

Secure Infrastructure: All website data and field data are consolidated on UK-hosted secure servers.

Under PIPL Article 13(6), we process personal information that has been lawfully published and is within a reasonable scope. This processing is necessary for cross-border commercial research and supply chain due diligence as described in this policy. We have assessed the UK's data protection framework (including the DUAA 2025) and have determined that it provides a level of protection that is not materially lower than that required under the PIPL.

To satisfy the security requirements of PIPL Article 38, all personal information exported from the PRC to our UK/EU servers is protected by a "Closed Loop" technical architecture. This includes the use of Stealth network protocols with obfuscation technology to prevent man-in-the-middle (MITM) attacks and regional node routing to ensure data remains encrypted and inaccessible to unauthorised local actors during the transit phase.

7. Third-Party Sub-Processors

To facilitate on-site verifications, the company shares limited 'Strictly Necessary' data (e.g., factory contact names, site addresses) with our Authorised Field Partners in China. These partners act as Sub-Processors and are contractually bound by data protection terms no less stringent than those outlined in this policy. We do not authorize these partners to use your data for any purpose other than the specific inspection instructed.

8. The "Snapshot" Rule & Retention

Our reports are "snapshots." We are not liable for changes in a supplier's status or personnel after the report delivery date.

Data is held for the duration of its commercial utility or the 6-year UK statutory limitation period, after which it is structurally archived or deleted.

9. Data Subject Rights (DUAA 2025 Enhancements)

Individuals whose data we process hold the following rights, as clarified by the 2025 Act:

Subject Access Requests (SARs): You may request a copy of your data.

"Stop the Clock" Provision: Under Section 75-78 of the DUAA, we may pause the statutory response period if we require further information to verify your identity or clarify the scope of your request.

Reasonable and Proportionate Searches: Our obligation to search for your data is limited to what is reasonable and proportionate within our active systems.

10. Human Intelligence & Automated Decision-Making

In accordance with Section 80 of the DUAA 2025 and Article 24 of the PIPL, the company confirms that we do not utilise solely automated processing to make decisions that have legal or similarly significant effects on data subjects. While Generative AI (GenAI) is used as an assistant to draft "Business Summary" sections within our reports, 100% of all AI-generated content is reviewed, edited, and fact-checked by a human consultant against verified primary source data. Human Intelligence remains the final arbiter of all findings and strategic advice.

11. Liability Limitations

In all instances, The company's total liability regarding data processing, payment handling, or report accuracy is strictly limited to the total value of the fees paid for the specific Service Tier (Digital, Physical, or Consultancy) associated with the claim. We are not liable for the actions or errors of third-party payment processors or for "Third-Party Data" provided by suppliers.

Our supply chain intelligence is synthesised from official Chinese registries, credit bureaus, and factory-provided documentation. The company is a "best-efforts" verification service, we are not responsible for inaccuracies, omissions, or fraudulent data contained within these third-party filings. Our reports are a "Snapshot" of a supplier's status at the time of the audit, we are not liable for subsequent changes in a supplier's legal or operational status once the report has been delivered.

12. Contact

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For all Subject Access Requests (SARs) or data queries, please email **enquiries@ckbr.co.uk** with the subject line "Data Query - FAO Privacy Lead."

Version History

| Version | Date | Description of Changes |
|---------|------------|---|
| v1.0 | 01/03/2026 | Initial Release |
| v1.1 | 07/03/2026 | Enhanced legal citations |
| v1.2 | 09/03/2026 | Added "Automated Decision-Making" Added "Financial Data" Section Added "Third-Party Sub-Processors" section |

Next Expected Review : March 2027