

Data Protection and Privacy Policy

Overview

We are committed to protecting your right to privacy and to ensuring that your information is secure. To prevent unauthorised access or disclosure we have put in place suitable physical, digital and managerial procedures to safeguard and secure the information we collect.

We will always adhere to the General Data Protection Act 2018, and the General Data Protection Regulation (EU) 2016/679 ("GDPR"), and any other applicable data protection laws in relation to our use of your information.

Information that we collect

We collect information about users to continually help improve our service.

To operate effectively and fulfil its legal obligations, our company needs to collect, maintain and use certain personal information about current, past and prospective customers, suppliers and other individuals with whom it has dealings. All such personal information, whether held on computer, paper or other media, will be obtained, handled, processed, transported and stored lawfully and correctly, in accordance with the safeguards contained in the Data Protection Act.

We are committed to the eight principles of data protection as detailed in the General Data Protection Act 2018. These principles require that personal information must:

- Be fairly and lawfully processed and not processed unless specific conditions are met.
- Be obtained for one or more specified, lawful purposes and not processed in any manner incompatible with those purposes.
- Be adequate, relevant and not excessive for those purposes.
- Be accurate and, where necessary, kept up to date.
- Not be kept for longer than is necessary.
- Be processed in accordance with the data subject's rights under the DPA.
- Be kept secure from unauthorised or unlawful processing and protected against accidental loss, destruction or damage.

Not be transferred to countries outside the European Economic Area, unless the country or territory ensures adequate protection for the rights and freedoms of the data subjects.

How we use information that we collect

We may collect and process the information we collect from you to fulfil your web page requests, contact you, or conduct research.

When you contact us, we keep a record of your communication to help solve any issues you might be facing. We may use your email address if you show interest in our services to inform you about our services, such as letting you know about upcoming changes or improvements.

Our website and online services use cookies. We use information collected from cookies to view things like your connection speed, details of your operating system, the time and duration of your visit and your IP address, to improve your user experience and the overall quality of our services.

For example, by saving your preferences, showing you tailored service features or adverts delivered by us. We may use the personal information we collect from you to build up a profile of your interests and preferences.

We may monitor, record, store and use any telephone, email or other electronic communications with you for training purposes, so that we can check any instructions given to us and to improve the quality of our customer service. We may report, store and share non-personal information such as online activity and engagement statistics to improve our sales and marketing processes.

Protecting your personal information

To the extent that sensitive personal data is processed about you, we will employ appropriate security measures given the nature of that data. However, you recognise that your use of the Internet and our online services is

entirely at your own risk. We have tried to create a secure and reliable website for our users. However, we have no responsibility or liability for the security of personal information transmitted via the Internet.

We do not intentionally collect information about children and believe that children should always get the consent of their parents before giving out any personal information or using our services.

We only provide certain employees with access to customer data and ensure that these employees are contracted to do so under relevant data protection policies. Breach of these policies are regarded as a disciplinary offence and will be dealt with under formal discipline procedures.

Information that we share

We may need to disclose your data to appropriate persons where required or permitted by law (for example, to law enforcement authorities in relation to the investigation of a suspected criminal offence). We may share your personal information to third-party service providers and partners so that they can carry out services for you on our behalf.

Where we share your personal information with Time Vendor Finance Limited, the personal information collected will be shared by them with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. If fraud is detected, you could be refused certain services or finance by Time Vendor Finance Limited. Further details of how your information will be used by Time Vendor Finance and these fraud prevention agencies, and your data protection rights, can be found here.

Keeping your personal data

We will retain your personal data in accordance with our retention schedule, to comply with financial regulations. The right to have your data removed is not an absolute right. We may need to retain your data if this information forms part of a statutory or legal obligation or existing contract.

Your responsibilities

Please inform us as soon as possible if any of the personal information you have provided us has changed.

Your rights

There are several rights that you may exercise which will depend on the legal basis for processing your personal data. In most cases, these rights are not absolute and there may be compelling or overriding legal reasons why we cannot meet these rights in full. You can at any time request a copy of the personal information that we hold about you, or have your personal data corrected or erased.

If you have any concerns about how we process your personal data, or wish to discuss or exercise your rights, please contact our Finance Director by writing to:

Data Protection Officer, Global 4 Communications Ltd, Global House, 60b Queen Street, Horsham, West Sussex, RH13 5AD or **Email:** privacy@global4.co.uk

Third Party Processors

Our carefully selected partners and service providers may process personal information about you on our behalf as described below:

Digital Marketing Service Providers

We periodically appoint digital marketing agents to conduct marketing activity on our behalf, such activity may result in the compliant processing of personal information. Our appoint data processors include:

(i) Prospect Global Ltd (trading as Sopro) Reg. UK Co. 09648733. You can contact Sopra and view their privacy policy here: <http://sopro.io>. Sopro are registered with the ICO Reg: ZA346877 their Data Protection Officer can be emailed at: dpo@sopro.io.