

# **Privacy Policy**

# Introduction

The Global Design Solutions Limited (GDS) privacy policy has been written with the European data protection law, General Data Protection Regulation (GDPR) in mind.

Our privacy policy explains how we collect and process your data when you interact with GDS. Also detailed in the policy is our protection of your data and how you can get in contact regarding it.

This policy applies to all areas of business that GDS operates within Europe and in any interactions our Korean branch has with European bodies.

This page is subject to updates as we further our understanding of GDPR (we will always endeavour to be at the forefront of understanding) and as policy itself changes. Further pages that detail our commitment to privacy include; <u>Cookie Policy</u> and <u>'Legitimate Interest'</u>.

# What is Personal Information?

Personal information is any information that identifies an individual. Examples of such include but are not limited to names, personal emails, phone numbers and IP addresses.

# How We Collect Your Personal Data

We only process (this does not mean that we market to you and would rely on your opting in) and retain your personal data when you interact with GDS in regards to us conducting a service on your behalf or as a third party on behalf of a company that needs us to fulfil your request. The only instances in which this would not apply is when data is willing provided (persons opt in for marketing) or when we collect and process your data for legal compliance. Further data use to be aware of includes, when we source data from a GDPR compliant third party to make an initial enquiry to those that would have a legitimate interest in our products or services. Any data we retain is done so on the basis that it is reasonably expected as part of running our business.

#### **Personal Data We Collect**

When using our website if you complete our forms and specify that you wish your details to be processed for marketing, we will collect any personal details that you fill in, however we will never ask for your data in return for something in exchange.

If you contact us by phone with a business enquiry, we will collect your name and telephone number. Your name and email address will be collected with any correspondence sent to any of the GDS email addresses, however this does not mean we consider you to be opted in unless you have stated that directly.

When making notes of conversations and requirements that are essential to our working relationship, we might write down relevant personal details. These might relate to; queries, complaints, preferences and services.

In the future we might also use cookies to collect data on your visits to our website and the preferences you exhibit there. This information will be collected cumulatively so IPs will not be associated with users. It might be that in future that we do explore the habits of individual IP addresses but we will only do this for company IP addresses. For further details on how cookies are used refer to our cookie policy here.

### How we Store Personal Data

Personal Data is stored for customers, customers' customers and opted in interested parties on a number of GDPR compliant platforms, including SAP and Zoho CRM. SAP holds data relating to finance and logistics and Zoho holds information on projects and services these parties are

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interested in. Data between the two platforms is kept homogenous through monthly imports of updated data from each platform to one another. Duplication is

avoided by syncing the data based on email addresses. For further details you may request details of our Data Audit, this is on the basis that we hold data relating to you.

# **Sensitive Personal Data**

GDS does not hold any personal data relating to mental or physical health, ethnic or racial origin, political standing, religious or spiritual beliefs, sexual orientation, trade union membership and criminal records.

# How We Use Your Personal Information

For those that have opted in to receive marketing, we will use your personal data to send details of exciting updates to products and services we offer and other marketing material. Customers and customers of our customers' data will be used to fulfil our obligations to you in providing our services and products.

In instances where the law demands, your data may have to be submitted to law enforcing bodies or courts.

#### Change How We Use Your Personal Information

You reserve the right to choose how we process your data and what communications we send you. Therefore, if we have any practices or data we collect that you are unhappy with you may request that we decease. You also have the right to specify what marketing material you receive.

# How to Access and Amend Your Personal Information?

As required by Law, you have the right to access, restrict or amend the personal information we hold on you. You may also demand that we do not hold or process your data in any way, although this might mean that you are unable to access our services requiring said data. To make a request in regard to your data rights please contact us via of the below methods; Via email to datacontroller@gds.uk.com

By hand written letter addressed to GDS - Unit 13 - Riverside Business Park. BS4 4ED By phone on 0117 325 0063

#### Sharing of Personal Information with Third Parties

We will never sell any personal information to third parties. In instances where we need our partners to provide our full service, we will share your details but they will only ever contact you to ensure the provision of said services.

Each external partner we work with will now have to complete a GDPR compliance checklist to ensure that they have provisions in place for the handling of your data. If you feel that your data has been mishandled in any way by a third party, please email datacontroller@gds.uk.com with the details.

We host personal data on platforms owned by external bodies, in each instance this data will never be used by a host company for marketing activity, although we cannot guarantee that they won't use cumulative data for product research.

Personal information might be required to be shared by law to detect or prevent fraudulent or illegal activity. Only relevant and necessary data will be shared in these instances.

In the event of the GDS company being sold, new management will have to gain your permission to use your data.

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# **Third Party Sites**

We do not sell or give your data to any external company unless entirely necessary to complete our obligations in business. However, if you travel to a third party via a link provided by GDS and sign up to their services we cannot ensure your security or privacy, we would always recommend that you check their privacy pages or contact them directly.

# How Long is Personal Data Held?

Personal information is only held as long as deemed necessary for the purpose it was collected. Retention is based on a three-year cycle for data sourced by Sales and Marketing but is updated on the basis of continued interaction from the owner of the data. If you own data held on our system you may request to see our full data audit for full details (requests to datacontroller@gds.uk.com).

# Where Personal Data is Processed?

Personal data is generally processed at the GDS headquarters in Bristol. Should data be collected outside of the UK it will be transferred at the earliest convenience.

# What are our Legal Reasons for Processing Data?

When processing data we must identify if we have the right to do so. Having analysed the ways in which we process personal data we have found on the most that we can do this through 'Legitimate Interest'.

# What is 'Legitimate Interest'?

When processing personal data, a company must have a legal basis for doing so. The most frequent means of justification is on grounds of 'Legitimate Interest'.

Legitimate Interest in terms of data is defined as;

The processing of data in ways that can be reasonably expected and having minimal effect on privacy or where there is compelling justification for processing.

Grounds for 'Legitimate Interest' are defined as;

The processing of personal data that is lawful on the basis that it is necessary for the 'Legitimate Interest' of the company handling the data or a third party to whom the data is disclosed. This is on the proviso that the rights and interests of the person whose data is handled does not override this.

For full details of our lawful processing of data please refer to our legitimate interest page. Please consult the ICO for further details on the definition of 'Legitimate Interest'.

# **Security Measures**

GDS ensures appropriate security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction and damage, using appropriate technical and organisational methods.

Further privacy information can be found on <u>Breach Policy</u> and <u>Data Protection</u> <u>Rights</u> Pages.

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