

GDPR Privacy Policy

This Privacy Policy sets out the basis on which any personal data, including but not limited to payment details and other information we collect from you or other sources or that you provide to us ("Information") will be handled by us in connection with your access and use of GDPR Direct's website (www.gdprdirect.com) (the "Site") and/or the GDPR Direct mobile application (collectively, the "Platform"), services and applications (collectively, the "Services"). We understand the importance you place on the Information, and we are committed to protecting and respecting your privacy. Please read the following carefully to understand our practices regarding your Information. By using our Site and Services, you agree to the handling of your Information in accordance with this Privacy Policy.

References in this Privacy Policy to "we", "our" or "us" (or similar) are references to GDPR Direct Ltd, Registered at St Georges House 215-219 Chester Road Manchester M15 4JE. References to "user" or "you" (or similar) are references to you as an individual or legal entity as the case may be.

If you use our Site and Services, you consent to the collection, use and sharing of your personal data under this Privacy Policy (which includes all other documents referenced in this Privacy Policy) and agree to the Terms of Use on the Site. We created this Privacy Policy to give you confidence as you use the Site and Services and to demonstrate our commitment to the protection of privacy.

WHAT INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following Information about you:

- Information relating to (but limited to) the following categories of information: (1) contact data (such as your e-mail address and phone number); (2) demographic data (such as your gender, your date of birth and your postcode code (or equivalent)); and (3) other identifying information that you voluntarily choose to provide to us, including without limitation unique identifiers such as passwords, and Information in emails or letters that you send to us;
- Information that you provide by filling in forms on our Platform, including information provided at the time of registering to use our Platform and other co-registrations, subscribing to our Services, posting material and information or requesting further services;
- Information you provide us, or that we may collect from you, when you report a problem with our Platform;
- a record of correspondence if you contact us;
- general, aggregated, demographic and non-personal Information;
- if you download or use our mobile application, we may have access to details about your location and your mobile device, including a unique identifier for your device;
- details about your computer, including but not limited to your IP address, operating system and browser type, as well as information about your general internet usage (e.g. by using technology that stores information on or gains access to your device, such as cookies, tracking pixels, web beacons, etc., (together, "Cookies"));
- your email address from a third party if you indicate that you have consented to that third party sharing your Information with us;
- any other Information we consider necessary to enhance your experience on the Platform.

HOW WE WILL USE YOUR INFORMATION

We may use Information held about you in the following ways:

- to provide you with information, feedback or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- to provide you with location-based services;
- contacting you when necessary or requested to facilitate your use of the Service;
- notifying you about certain resources or services we think you may be interested in learning more about;
- to improve our Services and to deliver a better and more personalised service to you;
- to ensure that content from our Platform is presented in the most effective manner for you and the device you use to access our Platform;
- to notify you about changes to our Services;
- for any other reason which we deem necessary to enhance your experience of the Platform.

TO WHOM WE MAY DISCLOSE YOUR INFORMATION

We share your Information only as described below and with businesses that follow practices at least as protective as those described in this Privacy Policy:

- Other Entities.** To offer you our Services, we may engage with businesses who are affiliates of us and/or non-affiliated service providers (e.g. marketing companies, government entities, regulators, payments processors to process online transactions, etc.).
You understand that it is important that such businesses have access to the relevant Information to perform their functions. We will ensure that these businesses do not use your Information for other purposes. By using our Platform, you hereby freely and specifically consent to the transfer, storage, use, and disclosure of your Information among businesses who are affiliates of us and/or non-affiliated service providers, wherever located. These businesses shall be contractually bound to respect the confidentiality of your Information.
- Marketing.** We may also use your Information to provide you with information about services which may be of interest to you and enhance your Platform experience, service messages, new features and enhancements. We may contact you via various channels, including without limitation emails, push notifications, web notifications, post, telephone, in-app messages and news feed cards.
We may permit third parties to use your Information. For example, we may provide advertisers Information to help them reach the kind of audience they want to target and to enable us to comply with our commitments to our advertisers (e.g. by displaying their advertisements to a target audience).
Additionally, you may be asked to provide additional Information to participate in some of our market research activities.
- Business Transfers.** In the event that we or substantially all of our assets are acquired, subscriber and customer information will be one of the transferred assets.
- Protection of Our Platform and Others.** We release account and other Information when we believe such a release is appropriate to comply with the law and law enforcement investigations and to protect the rights, property or safety of our users or others. This includes exchanging information with other companies and organisations for various reasons, such as fraud protection and credit risk reduction.

Note that our Platform may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data or other information to these websites. Please do not post or add personal data to the Site that you would not want to be publicly available.

HOW WE STORE YOUR INFORMATION

The information that we collect from you we may store, process and transmit this information in the Europe, United States and locations around the world – including outside your country. Information may also be stored locally on the devices you use to access the Services. Your personal data may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff are engaged in, among other things, the provision of support services, maintain and operating the Site, and providing security services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this policy. Each affiliate or supplier receiving your personal data is bound by standard contractual clauses that comply with the standard contractual clauses for the transfer of personal data to controllers established in third countries set out in the European Commission Decision 2010/87/EU.

WHAT SECURITY MEASURES WE APPLY

We maintain commercially reasonable technical, administrative, and physical safeguards to ensure your Information is treated securely and in accordance with this Privacy Policy, and to protect against unauthorized access or alteration to, disclosure, or destruction of your Information. We may, for example, use encryption technology to secure your Information during transmission to our Platform as well as external firewall and on-host firewall technology to prevent network level attacks. Only those authorized employees, contractors, and agents who need to know your Information in connection with the performance of their services are allowed to access this Information.

It is important for you to protect yourself against unauthorised access to your password and to your devices used to access our Services. You are responsible for keeping your password confidential. For example, ensure that you sign off when you have finished using a shared device.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Information, we cannot guarantee the security of your Information transmitted to our Platform and any transmission is at your own risk.

HOW CAN YOU ACCESS AND AMEND YOUR INFORMATION?

You are able to access a broad range of information about your account and your interactions with the Platform for the purpose of viewing and, in certain cases, updating your Information.

Examples of information you can access easily at the Platform include:

- personally identifiable information (including name, e-mail, password, communications and personalised advertising preferences);
- payment settings (including credit card information); and Direct Debit Information
- e-mail notification settings.

Data rights. In certain circumstances, you have the right to access and receive a copy of information we hold about you, to rectify any personal data held about you that is inaccurate and to request the deletion of personal data held about you. You also have the right to data portability for information you provide to us – this means that you can obtain a copy of your data in a commonly used electronic format so that you can manage and move it, or request we send it to a third party. You may have the right to restrict or object to the processing of your personal data by us including for direct marketing. You can exercise your rights by contacting us at support@gdprdirect.com. NOTE: We may ask you to verify your identity before responding.

You can opt-out of receiving future marketing communications from us at any time by adjusting your customer communication preferences, through live chat (if available) or the unsubscribe link within the email communication. For marketing via your mobile application, you will need to adjust your notifications settings in the general section of your mobile.

Also, our system will place cookies when you log on to our Platform and this is to ensure you have an enjoyable user experience and are able to utilise all aspects of the Platform. You may disable Cookies by changing the settings on your browser. If you disable Cookies, it will affect how our Platform works and you may not be able to access or use certain areas of our Platform or full functionality. For example, performance cookies collect information about how you use the Site, for instance, which pages you visit most often, which allows us to provide you with targeted and relevant choices that enhance your Site experience.

We may retain a copy of your Information for compliance reasons. When you update Information, we may retain a copy of the prior version for our records.

WHAT IF WE CHANGE OUR PRIVACY POLICY?

Our business changes constantly, and our Privacy Policy may therefore also need to change. We will post the current version of this Privacy Policy on the Platform and each such change will be effective upon posting on the Platform or upon the date designated by us as the "effective date".

We may e-mail periodic reminders of our notices and conditions, but you should check our Platform frequently to see recent changes.

It is your obligation to regularly check the Privacy Policy. Your continued use of the Platform following any such change constitutes your agreement to this Privacy Policy as so modified.

HOW YOU CAN CONTACT US

If you have any concerns about your Information on the Platform, please contact us at support@gdprdirect.com with a thorough description, and we will try to resolve it.