



PRIVACY POLICY

Read more about how and why we use your data here.

PERSONAL DATA

Under the EU'S General Data Protection Regulations (GDPR), personal data is defined as:

Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

There are also special categories of personal data and these concern:

- Racial
- Ethnic origin
- Political opinions
- Religious beliefs
- Philosophical beliefs
- Trade union membership
- Genetic data
- Health data
- Data concerning a natural person's sex life
- Sexual orientation

Both personal data and special categories of personal data (also known as personal sensitive data), are the concern of the GDPR, and the Data Protection Act 2018 (DPA), and the aim of the legislation is to ensure that data subjects' personal data and personal sensitive data is securely held and handled, and importantly, that consent has been obtained from the data subjects as to how their data may be (amongst others) collected, processed, analysed, stored. The GDPR gives data subjects control of their data and how it is handled. There are a number of rights that data subjects now have under the GDPR (see "your rights as a data subject" – further down the notice).

SCOPE

All data subjects whose personal data is collected, held, processed and stored by GDPR Technologies, in line with the requirements of the GDPR.

PRIVACY NOTICE

Who are we?

GDPR Technologies Ltd is the organisation who collects your data (including personal data) once you have loaded it on our Goowid proprietary platform, whose purpose is to provide you (the data subject) with a platform where you can securely Input your data, store your data and access your data. The control of your data remains fully with you at all times.

The personal data we collect will be used for the following purposes:

We use the information held about you in the following ways:

Information you give to us:



We will use this information to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services you request from us, to notify you about changes or to make suggestions and recommendations that may interest you about our range of products or services, or to ensure that the content from our site is presented in the most effective manner for you and for your computer.

Information we collect about you:

We will use this information to:

- administer our site and for internal operations including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- allow you to participate in interactive features of our services, when you choose to do so:
 - as part of our efforts to keep our site safe and secure;
 - to measure or understand the effectiveness of our advertising we serve to you and others, and to deliver relevant advertising to you;
 - to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

Why does GDPR Technologies need to collect and store personal data?

Simply put, we need to collect, store and host your personal data solely for the purposes of providing our services to you.

The personal data you input to our proprietary Goowid platform also assists us in providing any other services requested. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes, GDPR Technologies would contact you for additional consent. If you opted in for marketing in the future in regards to new products we offer, we will only contact you on your preferred method with details of new products or news from GDPR Technologies such as a newsletter.

GDPR Technologies will process (collect, store, host), the information you provide in a manner compatible with the GDPR. Your information is yours. The information that you input into our Goowid proprietary platform is for you to manage and we will never keep your data for longer than necessary. GDPR Technologies is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Consent

By consenting to this privacy notice you are giving us permission to collect, hold and store your personal data specifically for the purposes identified in any agreement we have with you.

Consent is required for GDPR Technologies to collect, hold and store both personal data and personal sensitive data, but this consent must be explicitly given. By engaging our services, specifically by choosing to use our Goowid proprietary platform for managing your data, you are giving consent for us to collect, hold and store that data. Please note that the data is always yours to control and to that end, you may withdraw consent at any time by terminating our Agreement.



Disclosure

GDPR Technologies will not pass your personal data to third parties without first getting your explicit consent. Any third parties that we may share your data with, are obliged to keep your details securely, and to use them only to fulfil the service they provide to you. When the third parties no longer need your data to fulfil this service, they will dispose of the details in line with GDPR Technologies' procedures.

If you wish us to pass on sensitive personal data onto a third party, we will only do so once we have obtained your consent, unless we are legally required to do so otherwise.

Retention period

GDPR Technologies will process personal data for the length of any agreement we have in place to manage a service we provide. If we can't, or you choose not to take out a service we provide, we will destroy your details unless you have opted in for further contact in regards to new products or news from GDPR Technologies. We will always provide you with the opportunity to opt out on all future correspondence such as email opt in/out.

We have come to agreement on the decision on this time period, as we believe this is how long we need the data to service the client's needs, and in regards to how long we hold data where the client opted in for further contact, we will retain this until the client chooses to opt out and he or she will be given the option to do so on all correspondence. We also make contact with the client every 12 months, asking him or her to opt in and if they do not respond or say no, we will destroy their details.

Security and performance

We use a third party programme to protect our website from malicious malware and attacks which means it will check your IP address on arrival.

Your rights as a data subject

At any point while we are in possession of are processing your personal data, you, the data subject, have the following rights:

- **Right of access:** you have the right to request a copy of the information that we hold about you.
- **Right of rectification:** you have the right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten:** in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing:** where certain conditions apply, you have the right to restrict the processing.
- **Right to portability:** you have the right to have the data we hold about you transferred to another organisation.
- **Right to object:** you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling:** you also have the right to be subject to the legal effects of automated processing or profiling.
- **Right to judicial review:** in the event that GDPR Technologies refuses your requests under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the section "Complaints" below.

All of the above requests will be forwarded on should there be a third party involved in the processing of your personal data.



How you can find out what information the organisation holds about you

GDPR Technologies at your request, can confirm what information we hold about you and how it is processed. If GDPR Technologies does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why your personal data is processed. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer if applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of GDPR Technologies or a third party, and information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, and information on how this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

In order to provide the above, GDPR Technologies accepts the following forms of ID:

Passport or photo driving licence and proof of address (utility bill – from the last 3 months). If you can't provide a passport or driving licence we will accept a birth certificate together with photo ID.

RESPONSIBILITIES

GDPR's Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to GDPR Technologies collecting/processing their personal data.

All Employees of GDPR Technologies who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

COMPLAINTS

In the event that you wish to make a complaint about how your personal data is being processed by GDPR Technologies or third parties, or how your complaint has been handled, you have the right to lodge a complaint directly with GDPR Technologies' data protection representative – Data Protection Officer, and/or the supervisory authority (ICO). The details of each of these contacts are:

**Data Protection Officer**

Solange Semedo

solange.semedo@etztec.com

120 New Cavendish Street, London, W1W 6XX.

0203 948 1700

<https://www.etzpayments.com/>

Information Commissioner's Office (ICO)

Wycliffe House, Water Lane, Wilmslow Cheshire SK9 5AF

<https://ico.org.uk>

casework@ico.org.uk

0303 123 1113