# Global Marketing Solutions' Privacy Policy as at 24 August 2018

Global Marketing Solutions (GMS) is committed to protecting your privacy.

This statement is made in the light of the requirements of the General Data Protection Regulation (GDPR) to alert users to GMS's data processing practices which will govern the processing of your personal data.

Legal basis for processing personal data

We have decided that the legal basis for our processing of your personal data is 'Legitimate Interests' in order to carry out our business, including to grow and improve our services and support to our clients, provided those interests are not outweighed by your rights and interests. We have conducted a Legitimate Interest Assessment (LIA) in order to arrive at this decision, if you wish to receive a copy of this LIA, please contact us on <a href="mailto:nicola@global-marketing-solutions.com">nicola@global-marketing-solutions.com</a> requesting a pdf of the LIA.

# What information do we collect and why?

We will obtain personal information from you when you enquire about our activities, register with us, attend one of our events or otherwise provide us with personal information.

The types of information collected might include names, e-mail address, postal address, telephone number, mobile phone number, credit/debit card details and dietary or access requirements.

#### What do we do with the information?

We will use the information you provide to:

- fulfil your requests such as provision of information about our services
- process sales transactions, or other payments and verify financial transactions
- handle orders, deliver products and communicate with you about orders
- provide a personalised service to you when you visit our websites this could include customising the content and/or layout of our pages for individual users
- record any contact we have with you
- prevent or detect fraud or abuses of our websites and enable third parties to carry out technical, logistical or other functions on our behalf
- communicate with our supporters and collaborators
- provide you with information that we think may be of interest to you.

We may use generic photographs taken at our events for promotional purposes. In the event we use identifiable images of individuals, we will have sought and obtained written consent.

### **Sharing your information**

We will only share your information if:

- We are legally required to do so, e.g. by a law enforcement agency legitimately exercising a power, if compelled by an order of the Court
- We believe it is necessary to protect or defend our rights, property or the personal safety of our people or visitors to our premises or websites.

We are working with carefully-selected partners that are carrying out work on our behalf. These partners may include, event organisers and venues, marketing agencies, accountants and IT specialists. The kind of work we may ask them to do includes sending emails, event registration and organisation, processing card payments. We only choose partners we can trust. Some of our suppliers may process data outside the EU, but we only share data with such recipients where appropriate standards and safeguards are in place. Whenever we share or transfer your personal information, we comply with the standards set by the GDPR and this privacy statement at a minimum.

## **Storing your information**

We take appropriate measures to ensure that the information disclosed to us is kept secure, accurate and up to date and kept only for so long as is necessary for the purposes for which it is used. We have security measures in place to attempt to protect against the loss, misuse and alteration of personal data under our control. For example, only authorised personnel can access user information. While we cannot ensure or guarantee that loss, misuse or alteration of data will not occur while it is under our control, we use our best efforts to try to prevent this.

### Retaining your information – data retention policy

If you have received marketing communications from GMS under our privacy policy and have not unsubscribed, you will be on our marketing communications mailing list for a maximum of five years (henceforth "your period of marketing contact") unless you unsubscribe during this time.

You will be notified when your period of marketing contact is coming to an end. You will be given the option to opt out to a further period of marketing contact.

We will continue to retain data for a period no longer than 10 years beyond the expiry of the final period of marketing contact save as may be required by law.

## Website cookies policy

We may use cookies to provide accurate monitoring reports to help us understand our users' interests and preferences, to ensure that our website is as user friendly as possible.

Our website may use Google Analytics, a service provided by Google Inc that uses cookies to help the website analyse how users use this site. The cookies will generate information about your use of the website, and this along with your IP address will be stored on servers in the United States by Google Inc. This information is retained for the purposes of evaluating and compiling reports on website activity and for other services relating to internet usage. This information may be transferred to third parties by Google Inc where

required to do so by law, or where such third parties process the information on their behalf. Your IP address will not be associated with any other data held by Google Inc.

If you do not agree to the processing of data about you by Google Inc in the manner and for the purposes set out above, you can select 'disable cookies' on your browser.

### Your rights

By providing us with your personal data, you consent to the collection and use of any information you provide in accordance with the above purposes and this privacy statement. You have the right to ask for a copy of the information we hold about you and to have any inaccuracies in your information corrected.

If you want to exercise these rights or update your personal details, please contact us at Global Marketing Solutions, 12-15 Hanger Green, London W5 3EL, London W5 3EL or email nicola@global-marketing-solutions.com or telephone +44(0)20 8998 2667.

### Data subject rights

As an individual whose personal data is processed by Global Marketing Solutions you have the following rights:

- the right to be informed which is what this privacy notice is for
- the right to access the data we hold about you the right to object to direct marketing – either use the 'unsubscribe' button on our emails or contact us directly
- the right to object to processing carried out on the basis of legitimate interests
- the right to erasure (in some circumstances)
- the right of data portability
- the right to have your data rectified if its inaccurate
- the right to have your data restricted or blocked from processing

To exercise any of these rights, please email us on <a href="mailto:nicola@global-marketing-solutions.com">nicola@global-marketing-solutions.com</a> to get in touch.

If you are not happy with the way we have handled your data and are unable to resolve the issue with us personally, you can make a formal complaint to the ICO.

We reserve the right to amend this privacy statement. If we do so, we will post notice of the change on our website and you will be deemed to have accepted such changes.

### **Employees and job applicants**

If you apply to work at GMS, we will only use the information you give us to process your application and to monitor recruitment statistics. If we want to disclose information to someone outside GMS – for example, if we need a reference, or need to get a 'disclosure' from the Criminal Records Bureau –

we will make sure we tell you beforehand, unless we are required to disclose this information by law.

If you are unsuccessful in your job application, we will hold your personal information for 12 months after we've finished recruiting the post you applied for. After this date we will destroy or delete your information.

If you begin employment with us, we will put together a file about your

If you begin employment with us, we will put together a file about your employment. We keep the information in this file secure and will only use it for matters that apply directly to your employment.

Once you stop working for us, we will keep this file according to our record retention guidelines. You can contact us to find out more about this.

#### **Data Controller**

GMS acts as a Data controller (as per GDPR Article 24) for (i) the personal data relating directly to its customers and (ii) for its own employee management purposes.



**Global Marketing Solutions** 

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