



Global Procurement Group Ltd

Privacy Policy

October 2019

Privacy Policy

At Global Procurement Group Limited and all its subsidiaries from time to time ("The Company") we are committed to protecting your privacy when you use our online or other services ("Services"). In this policy we explain how and why we collect, process, use and disclose your personal information, what we do with it and what controls you have over our use of it.

In this Privacy Policy the terms 'we' or 'us' means the Company or any of our subsidiary businesses.

Please read this Privacy Policy carefully as it contains important information to help you understand our practices regarding any personal information that you provide to the Company.

From time to time, we may change this Policy in response to changes in our systems and our continuing commitment to protecting your information.

As a result, please refer to this Privacy Policy regularly to review any amendments.

What data do we collect and how do we use it?

We may collect personal information (which means any information about an individual whose identity is apparent or can be reasonably ascertained from such information) from you in connection with a service or product provided to you by the Company, including: your name, postal address, email address, and about your business such as Company Name and business sector. In addition, when you order certain services from our website we may need to retain and process transaction and credit card information.

How we collect your information:

We may collect information provided in connection with the following activities:

- if you apply for or purchase any product or service from us;
- if you request information or assistance from us;
- if you use any other features of the website that may be offered from time to time and may require such information in order to utilise the feature.

Use of your information:

The Company collects and processes information about you for the following purposes:



Purpose	Legal Basis
To provide the product or service that you applied for	Performance of contract Data Subject Consent Legitimate interests
To provide you with any information on the products or services you have requested and respond to any queries	Data Subject Consent Legitimate interests
To inform you about improvements to the website	Data Subject Consent
To perform analysis to improve our products and services	Data Subject Consent
To confirm, update and improve customer records	Data Subject Consent Legitimate interests
To analyse, understand fully and develop relationships with us	Data Subject Consent
To troubleshoot problems with the CRM, or to customer experiences	Data Subject Consent
In connection with credit related services and to report on the performance of an account	Data Subject Consent Legitimate interests
To conduct statistical analysis and research	Data Subject Consent
To keep you informed of any of our other products and services and identify and market products and services that may be of interest to you	Data Subject Consent
To assist in any future applications	Data Subject Consent
For other purposes to which you consent	Data Subject Consent

Where we intend to process the personal data you have provided for a purpose other than that for which the personal data was collected, we shall provide you with information on that other purpose and with any relevant further information prior to that further processing.

How we might share your information

The third parties with whom we may need to share personal information to help us provide services and products to you and to run our Website are:

- our advisors;
- our third-party service providers who process information on our behalf to help run some of our internal business operations including email distribution, IT services, business support and customer services;



- independent debt recovery agencies or service providers, solicitors or other agents for the purpose of collecting monies due or outstanding on your account; and
- law enforcement bodies in order to comply with any legal obligation or court order.

We need to transfer personal information across the Company to help operate our business efficiently. We also allow third party service providers to process personal information where this is needed in connection with a service they provide to us. These arrangements may involve your personal information being located in various countries around the world e.g. India, where privacy laws differ. We only make these arrangements or transfers

where we are satisfied that adequate levels of protection are in place to protect information held in that country and the Company has in place an international data transfer agreement incorporating the EU approved model clauses for such transfers. You hereby understand and consent to the transfer of personal information to these countries and parties.

Retention of your personal information

The personal information that you provide will be retained by the Company as set out below and is in accordance with the data protection statutory regulations. However, we will take reasonable steps to destroy or de-identify personal information we hold if it is no longer needed for the purposes set out above.

Marketing

From time to time, we may send you information regarding products that we perceive may be of interest to you or your business. You may receive this information by letter, telephone or email. If, at any time, you prefer not to receive further communications from us in any or all forms (except in connection with information, products or services that you specifically request), you will have the ability to unsubscribe from such communications.

Cookies

Our website used cookies to distinguish you from other users and help provide you with a good experience when you visit our website. Our Cookies policy provides you with further detail about the cookies we use and the purposes for using these cookies. It also provides details for how you can change your settings to block or delete cookies although this may impact your viewing and use of our website.

Other Websites

We accept no responsibility or liability for the content of other websites which are not under the Company's strict control. We are not responsible for the protection and privacy of any information which you provide whilst visiting other websites and such sites are not governed by our Privacy Policy. We cannot control the content or the security of any third-party websites. Linking to such websites is done at the user's own risk and we make no representations as to those third-party websites' content. We cannot be held responsible for any loss or damage incurred by the user as a result of using third party websites. No links are intended to be, nor should be construed as, an endorsement of any kind by us of that other website.

You may not create a link to this website from another website or document without our prior written permission.

Security

The Company places great importance on the security of all information associated with our customers. We invest appropriate resources to protect your personal information, from loss, misuse, unauthorised access, modification or disclosure. For example, our security and privacy policies are periodically reviewed and enhanced as necessary and only authorised personnel have access to user information. However, no internet-



based site can be 100% secure and the Company cannot be held responsible for unauthorised or unintended access that is beyond our control. Although the Company will do its best to protect your personal information, we cannot guarantee the security of your data sent over the internet or by email.

Your rights

You have the right to request copies of your personal information within our custody and control and details of how we use that information. If any of the information held about you is incorrect or out of date, report your

concerns and we will amend our records. You also have the right to require us to stop processing your personal data and/or to withdraw your consent to processing based on consent. However, this may not apply where we have other legal justifications to continue processing your personal data.

Complaints process

If you have a complaint about how we have handled your personal information you may contact us using the details below and we will investigate your complaint. You also have the right to lodge a complaint with a supervisory authority (i.e. the ICO) once you have tried to resolve the issue with us.

Contact Us

If you have any questions about this Privacy Policy, or you think we have incorrect information or you would like a copy of the information we hold about you, you may request details of personal information which we hold about you; your request should be made in writing to enquiries@ngpltd.co.uk

This Policy has been approved by:

Name: Kevin Anderson

Position: Group Data Protection Officer

Signature: