

PRIVACY NOTICE

Last updated: October 2021

We are dedicated to safeguarding and preserving your privacy when visiting our site or doing business with us.

This Privacy Notice (**"Notice"**) provides an explanation as to what happens to any Personal Data that you provide to us, or that we collect from you.

By continuing to use our Website and services (**"Services"**), you agree to our Terms and Conditions (**"Terms"**) and this Privacy Notice for the collection and processing of your Personal Data.

This Privacy Notice sets out our use of any and all data collected by us in relation to your use of our website, www.hire2me.co.uk ("Website") and/or of services offered by us under the "Hire 2 Me Ltd" umbrella ("Services"). The Website is operated by Hire 2 Me Ltd, represented by Mr. James Green ("Hire 2 Me", "we", "us", "our", "ourselves").

For the purposes of processing your Personal Data, we are the Data Controller (as defined under Article 4 of the EU General Data Protection Regulation 2016/679 ("GDPR"). Personal Data ("Data") shall have the meaning given to it under Article 4 of the GDPR 2016/679, and which is more particularly defined in this Privacy Notice below.

This Privacy Notice should be read in conjunction with our Terms. We may amend or update this Notice from time to time and will publish revised versions on this Website. We reserve the right to alter and make changes to this Notice at our sole discretion and we therefore request all users to regularly refer to our Privacy Notice for updates and variations.

Who is the person responsible for the management of your Data?

As a business operating in the United Kingdom, we are registered with the Information Commissioner's Office (ICO) under registration number ZB239035

The person responsible for data protection is Mr. James Green. For any queries relating to the management of your Personal Data please do not hesitate to send us an email at hello@hire2me.co.uk

What Personal Data do we need/receive?

"Personal Data" has been defined under the GDPR 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."

Any references to **"Personal Data"** in this Notice therefore means information about living individuals, which, alone or in conjunction with other information held by us is capable of identifying them. The GDPR 2016/679, the UK GDPR, The Data Protection Act 2018 and any other national implementing legislation relating to data protection in the UK, regulate our use of your Personal Data (collectively **"Applicable Data Protection Law"**).

In order to provide our Services or for the purposes of conducting our business we may need the following Data from the individuals we are dealing with (**"you"**, **"yours"**, **"yourself/yourselves"**). We have tried to cover categories of Data that we generally require while providing Services to our clients or for the purposes of operating our business. However, this is not an exhaustive list.

- Your name
- Your physical and electronic addresses
- Your phone number
- If you are a company, the company registration number and registered office address
- For the purposes of making payments or any other transactions, bank details
- For employment purposes, National Insurance number.
- Details of your visits to our Website and the resources that you access, including, but not limited to, traffic data, location data, weblogs and other communication data.

- Any other information that you provide by filling in forms on our Website, such as when you register for information, send us a query or make a purchase of our Services.
- Any other information provided to us when you communicate with us for any reason.

Sources of Personal Data

We may obtain Personal Data from you when you contact us or get in touch with us via our Website or when you, or your organisation correspond with us through any means of communication. This includes Personal Data you provide to us when you:

- Contact us with a question or query or fill out our online form to make an enquiry ("Contact Form")
- Ask us to provide our Services to you, including calling us for any complimentary site surveys or visits
- Ask us to collaborate with you on any assignment
- Contact us or authorise anyone to contact us for the purposes of our Services
- Contact us to provide us your Services or goods
- Correspond with us to submit any complaints that you may have
- Correspond with us to address any complaints we may have raised
- Register for a seminar or event, whether hosted by us or otherwise, where information is shared between fellow members
- Register to receive updates and newsletters from us
- Attend events and provide our staff with your personal information, business cards or contact details
- Deal with us when we are providing Services to our clients (which maybe you, your dependent, your organisation or a third party)
- Submit identification documents directly to us or to third party agencies commissioned by us to collect your data for the purposes of carrying out identity checks, anti-money laundering checks and due diligence (We shall continue to remain the Data Controller for any information submitted to third-parties in connection with your dealings with us). We will provide a list of identification documents that you need to submit for us to run anti-money laundering checks and/or for other due diligence
- Contact us for the purposes of employment or apprenticeships
- Connect with us online and/or on social media platforms or join groups created and administered by us online and/or on social media

We may also collect and retain Personal Data

- Obtained from public sources about you or your organisation, which includes all information available on your website, the Companies House, or other online sources accessible through Search Engine Optimisation searches
- Obtained from third parties, that may include our clients, fellow-professionals and their firms or clinics, professional regulators, public bodies, and other entities, including providers of analysis, screening and database Services who have a right to disclose this information to us and
- Relating to whether our contacts read electronic correspondence from us or click on links we send them.

Identifying you as an individual

We may have clients with similar names, so it is vital for us that all clients are properly identified as individuals. In order to be absolutely sure that you have been correctly identified we may ask you for a number of pieces of information. Suitable items include:

- Full name
- Contact details
- National Insurance number
- A photo ID such as a passport or driving license
- Permanent (home, not a temporary) address
- Proof of address

We have tried to cover categories of Data that we generally require while providing Services to our clients. However, this is not an exhaustive list.

Use of Your Information

The information that we collect and store relating to you is primarily used to enable us to provide our Services to you. In addition, we may use the information for the following purposes:

i. To provide you with the information requested from us, relating to our products or Services, and to provide information on other products or Services which we feel may be of interest to you, where you have consented to receive such information

ii. To meet our contractual commitments to you, i.e., to provide our Services to you

iii.To notify you about any changes to our Website (such as improvements), terms of business or Service/product changes, that may affect our supply of Services to you

iv. To carry out research, including market research, statistical research on site traffic, sales and other commercial information to assist us in improving the Services we provide to you and to improve our Website

v. For internal use such as governance, quality control and monitoring purposes

vi. If you are an existing customer, we may contact you with information about products and Services similar to those which were the subject of a previous sale to you

vii. To send you newsletters and other promotional material if you have opted-in

viii. To connect with you on social media, if you have requested to connect with us and, once connected, to provide you with information and updates about us and our Services on social media ix. To liaise with relevant third parties such as insurers, loss adjustors, surveyors, architects, structural engineers and/or any other professional with who we may have to collaborate for the supply of Services to you

By completing our Contact Form/ Authorisation Form and/or by proceeding to purchase products and/or Services from us you provide consent for the use of your Personal Data as detailed above.

We do not knowingly collect or process Data from anyone under the age of 13 (thirteen) years old. Our Services and Site Content are not directed at minors, i.e., persons below the age of 18 [eighteen] years, especially children below the age of 13 [thirteen] years. If a minor for who you are responsible has submitted their Personal Data to us, you may contact us to request erasure of such minor's Personal Data.

Lawful basis for processing your Personal Data

The following is the lawful basis for processing your Personal Data:

Consent

In order to avail of our Services, you consent to us obtaining and processing your Personal Data. While dealing with you we may issue Terms of Business or execute a contract outlining the terms and conditions of our engagement with you. The Terms of Business/contract along with this Notice set out the purposes for which your Personal Data may be obtained and processed by us. By accepting the Terms of Business or by using our Website or by executing a contract with us and by continuing to deal with us you confirm that you have consented to us processing your Personal Data in accordance with our Terms and this Privacy Notice.

Contractual necessity

One of the grounds for obtaining and processing your Personal Data is so that we can perform our Services in line with the scope of work and Terms of Business mutually agreed to by us.

Compliance with legal obligations

We may have to collect Personal Data in order to comply with certain legislative and regulatory requirements relating to client due diligence. Consequently, we may process your Data to carry out identity checks, anti-money laundering checks, and maintain records of customer due diligence.

We may employ third party service providers, including electronic verification platforms for the purposes of carrying out client identity checks. However, we remain the Data Controllers.

Legitimate interests

In circumstances where you are a client or are an employee at *GNC* we may have to process your Personal Data to promote and pursue legitimate interests of the public and/or our organisation, and/or yours as our client or employee.

* However, you can object to us processing your Personal Data, on any of these bases at any time and, if you do so, we will stop processing the Personal Data unless we can show compelling legitimate grounds which override your rights and interest such as, without limitation your own health and safety or the health and safety of any other person(s), or the legitimate interest of the our organisation and/or the public or we need the Data to establish, exercise or defend legal claims – see "Your rights" below.

Who may use your information?

We are committed to keeping your e-mail address confidential. We do not sell, rent, or lease the subscription lists to third parties. We may disclose your Personal Data to enforce our policies, to comply with our legal obligations (such as if we are required to disclose your Personal Data under a court order, legal requirement and/or regulatory requirement) or in the interests of security, public interest, or law enforcement in any country where we have entities or affiliates. For example, we may respond to a request by a law enforcement agency or regulatory or governmental authority. We may

also disclose Data in connection with actual or proposed litigation, or to protect our property, security, people and other rights or interests.

We may share your Personal Data with our employees, independent contractors, consultants, partners and/or third parties who help deliver our Services to you. Examples include hosting our web servers, analysing data, providing marketing and administration assistance, and providing customer service. These companies will have access to your personal information as necessary to perform their functions, but they may not use that Data for any other purpose. Our contracts with all third parties processing our client's Personal Data shall outline their obligations relating to data protection.

We may share aggregated anonymised data with third parties in order to monitor our Services and to ensure consistent quality and safety relating to the Services provided to clients.

Please remember that when you share information publicly on the Website or on social media platforms, for example a comment on a blog post or within social media groups, it may be indexable by search engines, including Google, which may mean that the information is made public.

When you participate in conversations on social media your Personal Data is visible to members of the concerned social media group and to the public in general. Please note that you participate in social media related activities at your sole discretion, and we shall not be liable for the access and use of your Personal Data by third parties, via social media or otherwise, including circumstances, where third parties contact you or initiate a conversation with you, on social media or otherwise, as a result of your information made available to them via our social media page or groups or any activity you participate in through our social media platforms or by connecting with us on social media.

Storing Your Personal Data

We may transfer data that we collect from you to locations outside of the United Kingdom and the European Economic Area for processing and storing. Also, it may be processed by staff operating outside the European Economic Area who work for us or for one of our suppliers. For example, such staff maybe engaged in the processing and concluding of your order, the processing of your payment details and the provision of support services. By submitting your Personal Data, you agree to this transfer, storing or processing. We will take all reasonable steps to make sure that your Data is treated securely and in agreement with this Privacy Notice.

In accordance with the General Data Protection Regulations (GDPR) we have confirmed with all of the companies that process data on our behalf or that we use to provide Services or products that where Personal Data is involved, they are compliant and retain compliance with the GDPR.

Data that is provided to us is stored on our secure servers. Details relating to any transactions entered into on our Website will be encrypted to ensure its safety.

The transmission of information via the internet is not completely secure and therefore we cannot guarantee the security of Data sent to us electronically and transmission of such Data is therefore entirely at your own risk. Where we have given you (or where you have chosen) a password so that you can access certain parts of our site, you are responsible for keeping this password confidential.

How long do we retain your Personal Data?

Our policy is that we retain your Personal Data for as long as it is necessary for the purposes set out in this Notice, or as is required by applicable law, after which all of the Personal Data is disposed of securely to ensure compliance with Applicable Data Protection Law. Personal Data in digital form is deleted from all our devices, servers and CRM systems used by us, and hard copies are destroyed in a secure manner.

Use of Cookies

On occasion, we may gather information about your computer for our Services and to provide statistical information regarding the use of our Website.

Such information will not identify you personally as it is statistical data about our visitors and their use of our site. This statistical data does not identify any personal details whatsoever.

Similarly to the above, we may gather information about your general internet use by using a cookie file. Where used, these cookies are downloaded to your computer automatically. This cookie file is stored on the hard drive of your computer as cookies contain information that is transferred to your computer's hard drive. They help us to improve our Website and the Services that we provide to you.

All computers have the ability to decline cookies. This can be done by activating the setting on your browser which enables you to decline the cookies. Please note that should you choose to decline cookies, you may be unable to access particular parts of our Website.

Our advertisers may also use cookies, over which we have no control. Such cookies (if used) would be downloaded once you click on advertisements, (if any) on our Website.

For more information on Cookie Consent you may also want to visit the UK Information Commissioner's webpage on cookies:

https://ico.org.uk/for-organisations/guide-to-pecr/guidance-on-the-use-of-cookies-and-similar-technol ogies/

Where is your information processed?

Hosting and back-end infrastructure

We use third-party hosting services for the purposes of hosting data and files that enable our Website to run and be distributed as well as to enable us to run specific features and functions within our Website. Some of these functions work through geographically distributed servers, thereby making it difficult to identify the exact location where the Personal Data is stored.

Providing information to Google Inc.

Google collects information through our use of Google Analytics on our website. Google uses this information, including IP addresses and information from cookies, for a number of purposes, such as improving its Google Analytics service. Information is shared with Google on an aggregated and anonymised basis. To find out more about what information Google collects, how it uses this information and how to control the information sent to Google, please see the following page: https://www.google.com/policies/privacy/partners/

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): meeting our contractual obligations to Google under our Google Analytics Terms of Service (<u>https://www.google.com/analytics/terms/us.html</u>).

You can opt out of Google Analytics by installing the browser plugin

here: https://tools.google.com/dlpage/gaoptout

Transfer and storage of your information:

Information collected by Google Analytics is stored outside the European Economic Area on Google's servers in the United States of America.

Transfer of Personal Data

We may also use outsourced services in countries outside the UK as well as the EEA (European Economic Area) from time to time in other aspects of our business. Accordingly, data obtained within the UK, or any other country could be processed outside the UK and the EEA.

Where we transfer Personal Data to third parties outside of the UK and the EEA, we will ensure that the recipients comply with the provisions of the GDPR and Applicable Data Protection Laws and that they provide an adequate level of protection for the rights of persons whose Personal Data has been shared with them.

In addition, all our inbound and outbound email communications are TSL (Transport Security Layer) encrypted.

Marketing communications

If you have given permission, we may contact you about any of the following:

- Client & booking/order information
- Occasional information about our Services and offers
- Updates about GNC Restoration Limited
- Newsletters (if you have opted-in to receiving them)
- New blog posts

In compliance with Applicable Data Protection Law, all emails sent by us will clearly state who the email is from and will provide clear information on how to contact the sender. In addition, all marketing email messages will also contain concise information on how to remove yourself from our mailing list should you wish to, so that you receive no further email communication from us.

We are committed to keeping your information confidential. We will use your email address solely to provide timely information about us and our Services and we will maintain the information you send via email in accordance with Applicable Data Protection Law.

Change in Terms of Privacy

We reserve the right to alter our privacy policies. Any changes to the Notice will be posted on this page. This Website is controlled and operated by GNC Restoration Limited from its offices within the United Kingdom. We make no representations that materials, information, or content available on or through this Website are appropriate or available for use in other locations, and access to them from territories where, accessing such materials, information, or content is illegal is prohibited. Those who choose to access this Website from other locations do so on their own volition and are responsible for compliance with applicable local laws.

Third Party Links

You might find links to third party websites on our Website. These websites should have their own privacy policies which you should check. We do not accept any responsibility or liability for their policies whatsoever as we have no control over them.

Access to Information

The GDPR and The Data Protection Act 1998 give you the right to access the information that we hold about you. We will provide the information that we hold on you free of charge as long as this information hasn't been provided to you already. If the information is a copy of information already provided or is excessive then an administration cost of £10 will be charged. Should you wish to receive details that we hold about you please contact us using the contact details below. You will need to provide suitable evidence that you are the person that the information pertains to before we will release it. Information will be provided to you within one month of receipt of request.

Erasure of your information

If you are no longer a client with us then you have a right to erasure of your information. Once we have received your request for erasure we will ensure all Personal Data we hold on you is erased within one month of the receipt of the request

Other rights

Under the Data Protection Act you have the following rights in relation to your own Personal Data:

- to prevent us using your Data for direct marketing
- to have (in certain circumstances) inaccurate Personal Data corrected, blocked, or destroyed
- to access a copy of the information comprised in your Personal Data that is undergoing processing ("subject access rights")
- to object to automated decisions
- data portability, which allows you to get and use your Personal Data for different purposes
- the right to withdraw consent from us continuing to process your Personal Data and
- the right to restrict or object to processing that is likely to cause or is causing damage or distress
- the right to request us to erase your Personal Data

If you want to (1) tell us to stop using your Data for direct marketing or withdraw consent from us processing your Personal Data for any of the purposes mentioned in this Notice; (2) exercise your subject access rights; (3) tell us about inaccurate Personal Data you think we hold on you; or (4) object to a use you believe we're making of your Data which is causing, or is likely to cause damage or distress, or (5) request that we erase your Personal Data, please contact our Data Protection

Manager or write to us at this address:

James Green Hire 2 Me Ltd 64 New Cavendish Street London W1G 8TB

Contacting Us

We welcome any queries, comments or requests you may have regarding this Privacy Notice. Please do not hesitate to contact us at hello@hire2me.co.uk

Complaints

If you are unhappy with the way we are processing your Personal Data you can submit a complaint by writing to our Data Protection Manager at <u>hello@hire2me.co.uk</u> by sending your complaint to:

James Green Hire 2 Me Ltd 64 New Cavendish Street London W1G 8TB

You are also entitled to make a complaint at the Information Commissioner's Office (<u>https://ico.org.uk/make-a-complaint</u>)

The ICO's address is: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113 ICO website: <u>https://ico.org.uk</u>