

Privacy Notice

Who We Are

GP Computers Limited gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

GP Computers Limited's registered office is at Mountbatten House, Fairacres Industrial Estate, Windsor, Berkshire SL4 4LE and we are a company registered in England and Wales under company number 7868985. We are registered on the Information Commissioner's Office Register, registration number **ZA430746**, and act as the data controller and data processor when processing your data. Our Appointed Person can be contacted at compliance@gpcomputers.co.uk or Bobby Ivanov at Mountbatten House, Fairacres Industrial Estate, Windsor, Berkshire SL4 4LE.

Information That We Collect

GP Computers Limited processes your personal information to meet our legal, statutory, and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

The types of personal data that we collect could collect are (but not limited to): Name, Date of Birth, Home Address, Personal Email, Business Email, Home Telephone Number, Mobile Telephone Number, National Insurance Number, Passport Number, CCTV, audio recordings, Photo IDs, Special Category Data.

We collect information through providing our services, accounting practicing, directly from the data subject.

How We Use Your Personal Data (Legal Basis for Processing)

GP Computers Limited take your privacy very seriously and will never disclose, share or sell your data without your consent, unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time. ***The purposes and reasons for processing your personal data are detailed below:***

- *We collect your personal data in the performance of a contract or to provide a service. We use the data in assisting to complete transactions and orders of our services, administering your account, processing payments.*
- *We collect and store your personal data as part of our legal obligation for business accounting and tax purposes, and business operations.*

- *For compliance with applicable laws, regulations, court orders, government and law enforcement requests, to operate our services and products properly and to protect ourselves, our users and our customers and to solve any customer disputes.*
- *Communicating with you about our services. This could be responding to your enquiries or requests, service completion, communications required by law, or applicable corporate updates related to mergers, acquisitions or divestitures.*
- *We will occasionally send you marketing information where we have assessed that it is beneficial to you as a customer and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests.*
- *Maintaining the security of our websites, products, features and services, and preventing and detecting security threats, fraud or other criminal or malicious activity that might compromise your information. When you interact with us, we will also take reasonable steps to verify your identity, such as requiring a password and user ID, before granting access to your personal data. We may also maintain additional security measures, such as CCTV, to safeguard our physical locations.*

Your Rights

You have the right to access any personal information that GP Computers Limited processes about you and to request information about:

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (*where applicable*) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

Sharing and Disclosing Your Personal Information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. GP Computers Limited use third parties to provide selected services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

We will only share your personal data as follows and, when applicable, only with the appropriate contractual obligations in place:

Sharing with service providers and Partners:

We engage service providers or Partners to manage or support certain aspects of our business operations on our behalf. These service providers or partners may provide services such as accounting, payroll, business taxation for HMRC, credit card processing and fraud management services, human resources consultancy, product delivery, advertising and marketing activities (including digital and personalized advertising), IT services, debt collection and management or support of GP Computers Limited websites/hosting. Our service providers and partners are required by contract to safeguard any personal data they receive from us and are prohibited from using the personal data for any purpose other than to perform the services as instructed by GP Computers services. We also take steps to provide adequate protection for any transfers of your personal data in accordance with applicable law such as signing EU Standard Contractual Clauses with the service provider or partner, relying on their Privacy Shield certification, other approved codes of conduct or certification mechanisms or binding and enforceable commitments of the service provider.

Sharing with third parties:

We may also share your personal data with: (i) credit reference and fraud prevention agencies; (ii) debt collection agencies (for outstanding debts with us); If you choose to provide personal data to the other companies, that personal data will be handled according to the privacy policy of those companies, which may differ from GP Computers policies and practices.

Corporate Transactions

Circumstances may arise where, whether for strategic or other business reasons, GP Computers Limited decides to sell, buy, merge, or otherwise reorganise businesses. In such transactions, we may disclose or transfer your personal data to prospective or actual purchasers or receive personal data from sellers. Our practice is to seek appropriate protection for your personal data in these types of transactions.

Compliance with Law

We may also share your personal data when we believe, in good faith, that we have an obligation to: (i) respond to duly authorized information requests of law enforcement agencies, regulators, courts and other public authorities, including to meet national security or other law enforcement requirements; (ii) comply with any law, regulation, subpoena, or court order; (iii) investigate and help prevent security threats, fraud or other criminal or malicious activity; (iv) enforce/protect the rights and properties of GP Computers Limited or its subsidiaries; or (v) protect the rights or personal safety of GP Computers, our employees, and third parties on or using GP Computers Limited property when allowed and in line with the requirements of applicable law.

Safeguarding Measures

GP Computers Limited take your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including SSL, TLS, encryptions, restricted access, IT authentication, firewalls, anti-virus/malware.

Transfers Outside the EU

GP Computers Limited utilise some services (*or parts of them*) that may be hosted/stored in non-EU countries which means that we may transfer any information which is submitted by you through the e-mail outside the European Economic Area ("EEA") for the below purposes: - to fulfill GP Computers services.

Where this is the case, we will take steps to ensure the necessary level of protection for your information and abide by strict agreements and measures set out by GP Computers Limited to protect your data and comply with the relevant data protection laws.

Consequences of Not Providing Your Data [*if relying on statutory/contractual requirement basis*]

You are not obligated to provide your personal information to GP Computers Limited, however, as this information is required for us to provide you with our services and for business continuity. Therefore, we will not be able to offer some/all our services without it.

Legitimate Interests

As noted in the 'How We Use Your Personal Data' section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

We use the legitimate interests' legal basis for processing **name, email address** and have identified that our interests are important corporate announcements, product and services updates.

How Long We Keep Your Data

GP Computers Limited only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your basic personal data (*name, address, contact details*) for a minimum of 6 years after which time it will be destroyed.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

Special Categories Data [if applicable]

Owing to the products, services, or treatments that we offer, GP Computers Limited sometimes needs to process sensitive personal information (*known as special category data*) about you, as a part of providing our services. Where we collect such information, we will only request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so.

Where we rely on your consent for processing special category data, the Data Controller will obtain your explicit consent through a signature. You can modify or withdraw consent at any time, which we will act on immediately, unless there is a legitimate or legal reason for not doing so.

Marketing

Occasionally, GP Computers Limited would like to contact you with the updates on our services and that we provide. If you consent to us using your contact details for this purpose, you have the right to modify or withdraw your consent at any time by using the opt-out/unsubscribe options or by contacting GP Computers Limited directly on complaine@gpcomputers.co.uk

Lodging a Complaint

GP Computers Limited only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If however, you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

Bobby Ivanov

GP COMPUTERS LIMITED

Mountbatten House, Fairacres Industrial Estate, Windsor, Berkshire SL4 4LE

bobby@gpcomputers.co.uk

INFORMATION COMMISSIONER'S OFFICE

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF