

Privacy Policy

What is a Privacy Policy?

General Data Policy Regulation (GDPR) is a regulation designed to provide guidance and information with the ambition to safeguard users of the internet. As a result Data Privacy Policies are developed to reflect and provide information on how we meet the standards within this regulation. The policy recognises the guidelines and processes implemented in meeting the data privacy laws which require that anyone collecting personal information via their website needs to have a statement on how and why they do so.

This privacy policy applies when you use our services including use of website www.thegfsi.com. Davidsons Grace Ltd trading as Grant Funding Source International (theGFSI) governs the privacy of its users who choose to use it.

The policy sets out the different areas where user privacy is concerned and outlines the obligations and requirements of the users, the website and website owners. Furthermore the way this website processes, stores and protects user data and information will also be detailed within this policy.

Our Privacy Policy explains:

- What information we collect and why we collect it
- How we use that information
- The choices we offer, including how to access and update information

Introduction

theGFSI is an Intelligent International Directory Service. Our service provides a portal designed for sharing of information and signposting, matching service providers with potential customers and clients. Our Privacy Policy applies to any Member or Visitor to our Services.

Service Providers/Facilitators are pre-approved professionals who use our service to promote and make available information specific to their business and services.

Grant Funders are those offering grant funding from either the public or private sector.

Members are those who procured the provision to access information provided by the service providers/facilitators and or grant funders.

Users/Visitors include anyone accessing the services viewing content and data available to non-members.

Services

This Privacy Policy applies to your use of our Services. This Privacy Policy applies to www.thegfsi.com.

Your privacy matters to us so please take the time to familiarise yourself with our practices. If you have any questions contact us at

1. Information We Collect

1.1 Data You Provide To Us - You provide data to create an account with us.

a. Registration

- To create an account you need to provide data various generic information such as your name, email address and/or mobile number, and a password.
- Members will need to provide payment (e.g., credit card) and billing information.
- You create your GFSI profile (a complete profile helps you get the most from our Services).

b. Profile

- You have choices about the information on your profile, such as your Industry type, location of operations, additional office contact details, service provision and skills.
- Members have the option to complete a profile. In doing so you will maximise on the benefits of this service.
- You don't have to provide additional information on your profile; however, profile information helps all users to get more from our Services, matching most relevant services and providers with members' needs.
- It's your choice whether to include sensitive information
- We do **not** require any of our users to include sensitive data (e.g., race, ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual orientation or criminal record) in their GFSI LinkedIn profile. If you choose to post any such data, it is visible to others like the rest of the profile information you provide. on your profile and to make that sensitive information public. Please do not post or add personal data to your profile that you would not want to be publicly available.
- We do not sync your address book or calendar.

c. **Posting and Uploading**

- i. We collect personal data from you when you provide, post or upload it to our Services, such as when you fill out a form, (e.g., with demographic data), respond to a survey etc.
- ii. You don't have to post or upload personal data; though if you don't, it may limit your ability to identify, access and engage with an invaluable network of Service providers.

Data From Others

d. **Content and News**

- i. You and others may post content that includes information about you (as part of articles, posts, comments, videos) on our Services.
- ii. Information must be known to be true at the time of posting. At such time it is identified to vary or change, you must amend promptly in order to maintain the levels of service.
- iii. You must have permission to post information detailing someone outside your remit of responsibility or association unless prior approval is gained.

e. **Service Use**

- i. We log your visits and use of our Services, including mobile apps.
- ii. We log usage data when you visit or otherwise use our Services, including our sites, app and platform technology (e.g., our off-site plugins), such as when you view or click on content or perform a search, install or update one of our mobile apps. We use log-ins, cookies, device information and internet protocol ("IP") addresses to identify you and log your use.

f. **Cookies, Web Beacons and Other Similar Technologies**

- i. We collect data through cookies and similar technologies.
- ii. As further described in our **Cookie Policy**, the policy describes the use of cookies and similar technologies. We use cookies and similar technologies (e.g., web beacons, pixels, ad tags and device identifiers) to recognise you and/or your device(s) you are using. The software we use is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information. You can read Google's privacy policy here for further information <http://www.google.com/privacy.html>. Other cookies may be stored to your computer hard drive by external vendors when this website uses referral programs, sponsored links or adverts. Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal information is stored, saved or collected.

g. **Your Device and Location**

- i. We receive data from your devices and networks, including location data.
- ii. When you visit or leave our Services (including our plugins or cookies or similar technology), we receive the URL of both the site you came from and the one you go to next. We also get information about your IP address, proxy server, operating system, web browser and add-ons, device identifier and features, and/or ISP or your mobile carrier. If you use our Services from a mobile device, that device will send us data about your location based on your phone settings. We will ask you to opt-in before we use GPS or other *tools e.g. Bluetooth* to identify your precise location.

h. **Approved Users**

- i. When issued with log in details you are approved based on your registration:
 - 1. Member
 - 2. Service Provider/Facilitator
- ii. Activity and individuals' information is provided by the account holder. We are provided with individual information about you.
- iii. The account holder gives us permission clarifying data we are can collect and how we can use it.

i. **Sites and Services of Others**

- i. Once you leave our site or services we have no obligation or responsibility there of.
- ii. Any data collected from third party sites navigated as a result of using hyperlinks within our services, GFSI is not responsible for.
- iii. All users using hyperlinks to third party sites, take responsibility and recognise that once you leave www.thegfsi.com these terms and those associated with GFSI are no longer associated.

j. **Other**

- i. We are improving our Services, which means we get new data and create new ways to use data.

- ii. Our Services are dynamic, and we often introduce new features, which may require the collection of new information. If we collect materially different personal data or materially change how we use your data, we will notify you and may also modify this Privacy Policy.

2. How We Use Your Data

- a. We use your data to provide, support, personalise and develop our Services.
 - i. How we use your personal data will depend on which Services you use, how you use those Services and the choices you make in your settings. We use the data that we have about you to provide and personalise, including with the help of automated systems and inferences we make, our Services so that they can be more relevant and useful to you and others.
 - ii. Profile information is pivotal to this service. This information is collected direct from information input by approved users of your account.
- b. **Services**
 - i. Our Services help you connect with others, find and be found for work and business opportunities, stay informed and be more productive.
 - ii. We use your data to authorise access to our Services.
- c. **Stay Connected**
 - i. Our Services allow you to access up to date relevant information associated with professional services identifying relevant potential colleagues, partners, clients, and other professional contacts. To do so, you will provide information within your registration and profiles that you are matched within searches providing opportunity to engage professional opportunities.
 - ii. We will use data about you, such as your profile, matching your provision and or needs with profiles to suit activity associated with your registration.
 - iii. You can also opt-in to allow us to use your precise location or proximity to others for certain tasks e.g. identify your location and areas of preferred trade and operations to match members and service providers/facilitators.
 - iv. Visitors have choices about how we use their data.
- d. **Productivity**
 - i. Our Services are designed to support the connecting of service providers/facilitators and members. The infrastructure of the service is designed to match relevant profiles to support effectiveness of member searches.
 - ii. Third party hyperlinks allow parties to connect direct with recognised profile matches.
 - iii. Searches support that users profiles work in a way that allows you to collaborate with colleagues, search for potential clients, customers, partners and others to do business with, secure professional support and relevant activities associated with growth and diversification.

3. Services

There are four level of service

All users benefit from customised-search functionality and tools (including messaging and activity alerts) as part of our talent, marketing and sales solutions. Users access information via hyperlinks included in search results. Search results included profile information such as name, headline, company, and general location and brief of service and or products.

- a. Visitor level
 - i. Visitors to our services can access generic information including how to use our services, international tendering opportunities, international tax considerations
- b. Members
 - i. Access to all database information including industry specialists, service providers, grant funding, finance, education and training provision
 - ii. Those who choose to complete the company profile option will be notified of grant funding meeting their eligibility
- c. Service Providers/Facilitators
 - i. Promote and detail their services and products to be matched with members seeking to engage services, support and information
 - ii. Issue one newsletter per month
 - iii. Specify geographical areas of operations, industry target audiences, demographics of businesses
- d. Grant Funders
 - i. Promote grant funding matching with eligible applicants
- e. **Communications**
 - i. You determine communication you receive using your profile preferences and settings.

- ii. We will contact you through email, notices posted on our websites or apps, and other ways through our Services, including text messages and push notifications.
 - iii. We will send you messages about the availability of our Services, security, or other service-related issues. We also send messages about how to use the Services, network updates, reminders and promotional messages from us.
 - iv. You may change your communication preferences at any time. Please be aware that you cannot opt-out of receiving service messages from us, including security and legal notices.
 - f. **Advertising**
 - i. We do not endorse or offer a provision that adverts are displayed in any way on any of our platforms.
 - g. **Marketing**
 - i. We promote our Services to you and others.
 - ii. We use data and content about Members for invitations and communications promoting membership and network growth, engagement and our Services.
 - h. **Developing Services and Research**
 - i. We develop our Services and conduct research.
 - i. **Service Development**
 - i. We use data, including public feedback, to conduct research and development for the further development of our Services in order to provide you and others with a better, more intuitive and personalised experience, drive membership growth and engagement on our Services, and match those with a need to those with capabilities to support.
 - j. **Other Research**
 - i. We seek to create growth and diversification opportunities for Members and Service Providers/Facilitators assisting in being more productive and successful. We use the personal data available to us to research social, economic and demographic trends associated with cultural activities, economic and social behaviours that our service assists to help bridge the gap in various countries, industries and geographic areas. In some cases, we work with trusted third parties to perform this research, under controls that are designed to protect your privacy. We publish or allow others to publish economic insights, presented as aggregated data rather than personal data.
 - k. **Surveys**
 - i. Polls and surveys are conducted by us and others through our Services. You are not obligated to respond to polls or surveys, and you have choices about the information you provide. You may opt-out of survey invitations.
 - l. **Customer Support**
 - i. We use data to help you and fix problems.
 - ii. We use the data (which can include your communications) to investigate, respond to and resolve complaints and Service issues (e.g., bugs).
 - m. **Aggregate Insights**
 - i. We use data to generate aggregate insights.
 - ii. We use your data to produce and share aggregated insights that do not identify you. For example we may use your *data including inferences drawn from data about you such as your age or gender* to generate statistics about our members, their profession or industry to publish visitor demographics for a Service or demographic insight.
 - n. **Security and Investigations**
 - i. We use data for security, fraud prevention and investigations.
 - ii. We use your data (including your communications) if we think it's necessary for security purposes or to investigate possible fraud or other violations of our User Agreement or this Privacy Policy and/or attempts to harm our Members or Visitors.
- 4. **How We Share Information**
 - a. **Our Service**
 - i. Any data that you include on your profile and any content you post or social action you take on our Services will be seen by others.
 - b. **Profile**
 - i. Your profile is fully visible to all Members. Members using our access channels and search types (e.g., by name or by keyword) impact the availability of your profile and they can view all fields in your profile.

- ii. Our Services allow viewing and sharing information through the database, news and posts.
 1. Contact information and details of service will only be shared with members via the database.
 2. News and posts will be shared as they appear in other media sources
 3. Newsletters will be shared identified as preapproved by your internal processes, once approved by our internal processes the newsletter will be published.
 4. Your employer/account holder is responsible for how you use our Services. All activity is reportable to the account holder. There is no expectation of privacy of activity for individuals unless you are the account holder and sole user of the service.
- c. **Communication Archival**
 - i. Regulated Members may need to store communications outside of our Service.
 - ii. We archive all information for a period of 7 years.
 - iii. Independent communication between any parties other than ourselves are your responsibility of each individual party unless prior notification given.
- d. **Service Providers**
 - i. We may use others to help us with our Services.
 - ii. We use others to help us provide our Services (e.g., maintenance, analysis, audit, payments, fraud detection, marketing and development). They will have access to your information as reasonably necessary to perform these tasks on our behalf and are obligated not to disclose or use it for other purposes.
- e. **Legal Disclosures**
 - i. We may need to share your data when we believe it's required by law or to help protect the rights and safety of you, us or others.
 - ii. It is possible that we will need to disclose information about you when required by law, subpoena, or other legal process or if we have a good faith belief that disclosure is reasonably necessary to
 1. investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies
 2. enforce our agreements with you
 3. investigate and defend ourselves against any third-party claims or allegations
 4. protect the security or integrity of our Service
 5. exercise or protect the rights and safety of GFSI, our Members, personnel, or others. We attempt to notify Members and Service Providers/Facilitators about legal demands for their personal data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.
- f. **Change in Control or Sale**
 - i. We may share your data when our business is sold to others, but it must continue to be used in accordance with this Privacy Policy.
 - ii. We can also share your personal data as part of a sale, merger or change in control, or in preparation for any of these events. Any other entity which buys us or part of our business will have the right to continue to use your data, but only in the manner set out in this Privacy Policy unless you agree otherwise.

5. Your Choices & Obligations

a. Data Retention

- i. We keep most of your personal data for as long as your account is open and for seven years thereafter. This will be kept for analysis purposes solely.
- ii. We retain your personal data while your account is in existence or as needed to provide you Services. This includes data you or others provided to us and data generated or inferred from your use of our Services. We will retain your information and keep your profile open until you decide to close your account.
- iii. In some cases we choose to retain certain information in a depersonalized or aggregated form.

b. Rights to Access and Control Your Personal Data

- i. You can access or delete your personal data. You have many choices about how your data is collected, used and shared.

- ii. We provide many choices about the collection, use and sharing of your data, from deleting or correcting data you include in your profile and communication controls. We offer you settings to control and manage the personal data we have about you
- iii. For personal data that we have about you:
 1. **Delete Data:** You can ask us to remove the availability or some of your data (e.g., if it is no longer necessary to provide Services to you).
 2. **Change or Correct Data:** You can edit some of your data through your account. You can also ask us to change, update or fix your data in certain cases, particularly if it's inaccurate.
 3. **Object to, or Limit or Restrict, Use of Data:** You can ask us to stop using all or some of your data (e.g., if we have no legal right to keep using it) or to limit our use of it (e.g., if your personal data is inaccurate or unlawfully held).
 4. **Right to Access and/or Take Your Data:** The account holder can request copies of information input by any of its users registered against the account.
 5. Users may contact us using the contact information below, and we will consider your request in accordance with applicable laws.

c. Account Closure

- i. We keep some of your data even after you close your account.
- ii. If you choose to close account, your data remain to be visible to members of our Services unless your services are no longer available due to closure or end of provision legally and operationally indefinitely.
- iii. We retain your personal data even after you have closed your account if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce our User Agreement.

6. **Other Important Information**

a. **Security**

- i. We monitor for and try to prevent security breaches. Please use the security features available through our Services.
- ii. We implement security safeguards designed to protect your data, such as HTTPS. We regularly monitor our systems for possible vulnerabilities and attacks. However, we cannot warrant the security of any information that you send us. There is no guarantee that data may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

b. **Cross-Border Data Transfers**

- i. We store and use your data outside your country.
- ii. We process data internationally and rely on legally-provided mechanisms to lawfully transfer data across borders. **Learn more.** Countries where we process data may have laws which are different, and potentially not as protective, as the laws of your own country.

c. **Lawful Bases for Processing**

- i. We have lawful bases to collect, use and share data about you. You have choices about our use of your data.
- ii. At any time, you can withdraw consent you have provided by going to settings.
- iii. We will only collect and process data about you where we have lawful bases. Lawful bases include *consent*
- iv. Where we process data based on consent, we will ask for your explicit consent. You may withdraw your consent at any time, but that will not affect the lawfulness of the processing of your personal data prior to such withdrawal. Where we rely on contract, we will ask that you agree to the processing of data that is necessary for entering into or performance of your contract with us. We will rely on legitimate interests as a basis for data processing where the processing of your data is not overridden by your interests or fundamental rights and freedoms. (where you have given consent), contract (where processing is necessary for the performance of a contract with you and "legitimate interests").
- v. Where we rely on your consent to process data, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object.

d. **Direct Marketing and Do Not Track Signals**

- i. Our statements regarding direct marketing and "do not track" signals.

- ii. We currently do not share personal data with third parties for their direct marketing purposes.
- e. **Contact Information**
- i. You can contact us or use other options to resolve any complaints.
 - ii. If you have questions or complaints regarding this Policy, please email us at enquiries@thegfsi.com

Resources & Further Information

- [Data Protection Act 1998](#)
- [Privacy and Electronic Communications Regulations](#)
- [Privacy and Electronic Communications Regulations - The Guide](#)
- [Twitter Privacy Policy](#)
- [Google Privacy Policy](#)

Signed: *A Davidson*

Name: Andrea Davidson

Position within Company: Director

Date: 7th September 2018