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PRIVACY POLICY – OUR COMMITMENT TO YOUR PRIVACY

This Privacy Policy sets out how GFM Holdings Ltd (GFM), complies with the General Data Protection Regulation in regards to the lawful processing of data. For the purpose of the Data Protection Legislation and this policy, we are the ‘data controller’ CONTROLLER. This means that we are responsible for deciding how we hold and use personal data about you.

Any third party organisation we share your data with, with your consent, offering services, goods, employment services or recruitment is under the legislation of ‘data processor’ PROCESSOR.

GFM, under the authority as the CONTROLLER process data in accordance with specific instructions. Services may include recruitment, fulfilment of products by media such as, but not limited to, post, email, downloadable vouchers. Other services include contact centre services such as inbound or outbound telephone calls, email handling and live chat. Your data may be stored securely on our systems for the purpose of providing services to the CONTROLLER.

GFM will process your personal data in accordance with this Privacy policy and the Privacy Policy of the PROCESSOR if applicable

The contact details for GFM’s Data Protection Officer (DPO) are as follows:

Data Protection Officer
GFM Holdings Ltd
42 Phoenix Court
Hawkins Road
Colchester
CO2 8JY
dpo@gfm.co.uk

WHAT IS PERSONAL INFORMATION?

Personal information is information about you and from which you can be identified. It can include your name, address, contact details, username, customer reference numbers, CCTV and where relevant details of your purchases.

Personal information may also be held for employment purposes and include details of your qualifications, skills, experience, employment history, references, identity documentation, information about your current level of remuneration, including benefit entitlements; information about your entitlement to work in the UK, bank details and medical information in relation to your health and safety in the workplace and fitness assessment to carry out moderated duties.



PRIVACY POLICY DATA CONTROLLER

For the avoidance of doubt, other than banking details for employment, GFM does not store any financial information i.e. debit/credit card details as payments are taken through PCI compliant third party payment gateways.

Data may be collected from website information including tracking and cookies on our systems.

WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

In connection with the uses referred to above, we may disclose your personal information to certain third parties, including:

External agencies and organisations (including the police and other law enforcement agencies) for the purpose of preventing and detecting fraud (including fraudulent transactions) and criminal activity and for the assessment and collection of tax;

Our insurers and insurance brokers and our and their advisers in the event that a claim is made or could be made against us.

In the event that we sell or buy any business or assets, we may disclose personal information held by us to the prospective seller or buyer of such business or assets. If we or substantially all of our assets are acquired by a third party (or subject to a reorganisation within our corporate group), personal information held by us will be one of the transferred assets.

We may pass your personal information to third parties if we are under a duty to disclose or share your personal information in order to comply with any legal or regulatory obligation (including in connection with a court order), or in order to enforce or apply the agreements we have with or otherwise concerning you (including agreements between you and us (or one or more of our affiliates)); or to protect our rights, property or safety or those of our customers, employees or other third parties.

You should be aware that, if we are requested by the police or any regulatory or government authority investigating suspected illegal activities to access and disclose individually identifiable information concerning your activities whilst using our website, we reserve the right to do so. We also reserve the right to disclose individually identifiable information to third parties where a complaint arises concerning your use of our services, and that use is deemed by us inconsistent with the terms governing use of our services.

Your information may be shared with a PROCESSOR for recruitment purposes if your application for employment is successful and we make you an offer of employment. We may share your data with former employers to obtain references for you, employment background check providers PROCESSOR to obtain necessary background checks.

HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION?

We will keep your personal information for as long as is necessary given the purposes for which we collected and use that information, or to fulfil statutory or legal obligations.

This is reviewed at least annually in accordance with our Data Retention Policy

If your application for employment is unsuccessful, the organisation will hold your data on file for 3 (three) months after the end of the relevant recruitment process. If you agree to allow us to keep your personal data on file, we will hold your data on file for a further 3 (three) months for consideration for future employment opportunities. At the end of that period, or once you withdraw your consent, your data is deleted and destroyed. You will be asked when you submit your CV whether you give us consent to hold your details for the full 6 months in order to be considered for other positions or not. If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your Human Resources file (electronic and paper based) and retained during your employment. Employment data is held for 6 years in accordance with regulation.

HOW DO YOU MANAGE MY INFORMATION?

We may process your personal data for purposes necessary for the performance of our contract with you and to comply with our legal obligations.

We may from time to time appoint third party service providers PROCESSOR, to help us manage efficient systems within the business. Some of these systems may for operational reasons may be located in countries overseas including the USA, although wherever possible we will keep all data within the United Kingdom.

We will only transfer your information to PROCESSOR service providers who help manage our systems and employment services, such as cloud backup facilities and cloud solution providers, such as but not limited to Amazon Web Services, Iomart.com (cloud provider); employment services such as but not limited to Citation, Atlas, Sage; where we are satisfied that this is lawful and that adequate levels of protection are in place to protect the integrity and security of any information being processed and compliant with applicable privacy laws.

We may process your personal data for the purposes necessary for the performance of our contract with our clients. This may include processing your personal data where you are an employee, subcontractor, supplier or customer of our client.

GFM adopt a principle of least privilege with respect to personal data, in accordance with our Access Control Policy.

GFM provide security awareness and data protection training to all staff. All staff are required to comply with GFM data protection policies.

GFM will ensure we have appropriate firewall's in place. Information transiting systems will be encrypted

MARKETING COMMUNICATIONS

GFM, the CONTROLLER, may process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, business development, statistical and management purposes. If you subsequently wish to stop us processing your data for our legitimate interests, you may unsubscribe at any time and within any applicable communication you receive.

Even if you choose not to receive marketing, we may still use your personal information to provide you with important services communications, including communications in relation to any products or services you may have purchased.

GFM never share your personal data with any third parties, including advertisers, sponsors, or partners, except where users have given their explicit authority to the CONTROLLER.

In some circumstances, we may anonymise or pseudonymise the personal data so that it can no longer be associated with you, in which case we may use it without further notice to you.

CALL RECORDING

Telephone calls to our contact centre may be recorded for training and monitoring purposes. Email and Chat transcripts will be stored and may be processed.

CCTV

GFM premises are protected by CCTV. The perimeter, car park, exits and a limited number of internal office cameras are in operation. The perimeter and car park camera are for security and are mandatory for compliance. CCTV is recorded on premises and not exported off site. A limited number of IT support and management staff have access to the still images and video footage. CCTV is not shared with clients or third parties, unless for legal purposes such as a police investigation. The CCTV isn't routinely monitored, it is only accessed for investigative purposes on demand, requests are in writing and only allowed if authorised. Examples include, but are not limited to, reports of theft, security purposes, alleged damage to property, confirmation of attendance, accidents, suspected breach of protocol or GFM compliance. CCTV will be provided to police or any regulatory or government authority investigating suspected illegal activities.

SECURITY

GFM operates commercially reasonable and appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered

or disclosed. Our security and privacy policies are periodically reviewed and enhanced as necessary and only authorised individuals have access to the information provided.

YOUR CONSENT

By using CONTROLLER services or accepting employment at GFM, you consent to the collection and use of this information by the CONTROLLER, and subsequently the data shared by the CONTROLLER to PROCESSOR(s). If we decide to change our privacy policy, we will post those changes on this page so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it.

WHAT RIGHTS DO YOU HAVE WITH RESPECT TO YOUR PERSONAL INFORMATION?

Under the General Data Protection Regulation, you have certain rights with respect to your personal information, including the right to request access to your personal information.

If you believe the information held about you is inaccurate and requires correction, please contact the CONTROLLER.

Should you wish to obtain a copy of the personal information held about you, please contact the CONTROLLER.

You have the right to object to the processing of your data. Please contact the CONTROLLER to discuss this further or exercise your right.

You may have your personal data erased in a number of circumstances, such as where it has been unlawfully processed, or where there is no overriding legitimate grounds for the processing

We will offer our full cooperation to the CONTROLLER to ensure any request made to exercise your rights under any legal obligations.

COMPLAINTS

If you have a complaint regarding the use of your personal information by GFM, please contact us using the details below:

Email: dpo@gfm.co.uk or write to us at;

Data Protection Officer
GFM Holdings Ltd
42 Phoenix Court
Hawkins Road
Colchester
CO2 8JY



PRIVACY POLICY DATA CONTROLLER

You have the right to raise a complaint directly to the ICO who regulate data protection.
You can reach them at <https://ico.org.uk/>