

# GWD Privacy Policy

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Good With Devices Ltd ("GWD", "us", "we"), is a company registered in England and Wales with company number 04697344 and registered address Albert House, 2 Bells Square, Sheffield, S1 2FY, United Kingdom.

Our website is located at [www.gwd.team](http://www.gwd.team) (the "Website").

We are committed to protecting your privacy and will only use the information that we collect about you lawfully. This policy is intended to give you an understanding of how and why we use the information you provide to us both online and otherwise.

## 1) What information do we collect about you?

### For organisations that express an interest in our services:

We collect personal data about your staff, directors or trustees for a number of reasons, including communicating with you, responding to requests for information.

The personal data we collect can include:

- name
- contact details
- records of your communication with us

### For organisations that buy from us:

In addition to that personal data collected above we may also collect further information about directors/trustees to process a merchant account application with a selected payment provider.

The personal data we collect can include:

- name
- contact details
- records of your communication with us
- date of birth
- private address
- copies of identity documents

### For individuals that are making a payment to our customers:

We do not see, collect or store any sensitive payment data whatsoever when processing a card transaction. The data which is required to perform a card transaction will be captured, but all data is encrypted at source, and therefore not visible to us.

We may record an anonymised payment token that lets us know if you are a repeat user. We may use this to streamline the process when you use the service in future.

## 2) How will we use the information about you?

### For customers or potential customers:

We will process your data for the following reasons:

- to provide our services
- to supply you with communications you have requested about our products or services
- to provide customer support
- to keep a record of your relationship with us
- to manage your communication preferences
- to monitor and mitigate fraudulent and illegal activities
- to comply with applicable laws and regulations, and requests from statutory agencies



## **For individuals that are making a payment to our customers:**

We will process your data for the following reasons:

- to ensure that the payment is received by the relevant organisation and to provide our services to our customers
- to monitor and mitigate fraudulent and illegal activities

## **Website**

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **Cookies Policy**

When someone visits our Website, we use Google Analytics, a web analytics service, to collect standard Internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the Website. This information is only processed in a way, which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our Website. If we do want to collect personally identifiable information through our Website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

## **3) Our legal basis for processing personal data**

We need a lawful basis to collect and use your personal data under data protection law. The law allows for six ways to process personal data (and additional ways for sensitive personal data). Four of these are relevant to the types of processing that GWD carries out. This includes information that is processed on the basis of:

- A person's consent (for example to send you direct marketing by e-mail and for our website visitors)
- Processing necessary for the performance of a contract with you (for our customers)
- Processing that is necessary for compliance with a legal obligation
- Our legitimate interests

Personal data may be legally collected and used if it is necessary for a legitimate interest of the organisation using the data, as long as that interest is not overridden by the privacy rights of the individual whose data is being used. If you would like to change our use of your personal data, please get in touch with us using the details in the "How to contact us" section below.

## **4) Will we share this information with others?**

We do not share, sell or rent your information to third parties for marketing purposes. We will not otherwise disclose your personal information unless required to do so by a regulatory agency or law or unless we have consent from you.

We may allow our staff, consultants and/or external providers acting on our behalf to access and use your information for the purposes for which you have provided to us (e.g. to analyse data or to process payments). We make sure your information is treated with the same level of care as if we were handling it directly.

## **5) How do we protect the security of personal data?**

We ensure that there are appropriate physical, technical and managerial controls in place to protect your personal details.

All information you provide to us is stored on our secure servers.

Any payment transactions will be encrypted.

Where we have given you (or where you have chosen) a password, which enables you to access certain GWD services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Please note, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.



## 6) How long do we keep your data for?

We will keep your personal data for no longer than is necessary for the purposes for which it is processed, in accordance with our policies or applicable regulation.

Once the retention period has expired, the information will be deleted or archived.

## 7) Your rights

Individuals have the following rights under data protection legislation:

- A right to ask for a copy of their personal data
- A right to ask us to delete or correct any information we hold about them that is inaccurate. You can request any amendments or rectifications to your data by contacting us and to notify us if you would like us to delete or erase your data.
- A right to request erasure of information in certain circumstances. Please note that, in certain circumstances, we may not be able to delete or erase your personal data such as where this is still required for the purpose for which it was provided or where we have overriding legitimate interests in retaining your data.
- A right to data portability
- A right to restrict processing and a right to object to processing activities in certain circumstances
- A right to stop your information from being used for direct marketing purposes. Where any processing is based on consent you have a right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- A right to lodge a complaint with the Data Protection Commissioner (or other supervisory authority in the European Union) if you believe that your information has not been processed in accordance with the requirements of the data protection legislation.

If you are unhappy with the way we handled your personal data, please contact us using the details below. You are also entitled to make a complaint to the Information Commissioner's Office at <https://ico.org.uk/>

## 8) Governing Law

This Policy and any dispute or claim arising out of it or in connection with it or its subject matter shall be governed by and construed in accordance with the laws of England and Wales and the parties irrevocably agree that the courts of England have exclusive jurisdiction to settle any dispute or claim arising out of or in connection with this policy or its subject matter.

## 9) How do we update our privacy policy?

We may update this policy from time to time without notice. We therefore advise you to consult this policy frequently.

The privacy policy was last updated in May 2020.

## 10) How to contact us

Please email us at: [connect@gwdevices.com](mailto:connect@gwdevices.com)

