Gordon Charles Capital (reg. no. 17332547) with address **C/O Carroll Accountants**
Unit L, Bpi House, Cores End Road, Bourne End, Bucks, United Kingdom, SL8 5AS.
Our Data Protection Lead can be contacted at **info@gordoncharlescapital.co.uk**. We have produced this privacy notice in order to keep you informed of how we handle your personal data. All handling of your personal data is done in compliance with the UK Data Protection Act 2018 and the General Data Protection Regulation (EU) 2016/679 ("Data Protection Legislation"). The terms "Personal Data", "Special Categories of Personal Data", "Personal Data Breach", "Data Protection Officer", "Data Controller", "Data Processor", "Data Subject" and "process" (in the context of usage of Personal Data) shall have the meanings given to them in the Data Protection Legislation. "Data Protection Lead" is the title given to the member of staff leading our data protection compliance programme in lieu of a requirement for a Data Protection Officer.

What are your rights?

When reading this notice, it might be helpful to understand that your rights arising under Data Protection Legislation include:

- The right to be informed of how your Personal Data is used (through this notice);
- The right to access any personal data held about you;
- The right to withdraw consent at any time, by emailing info@gordoncharlescapital.co.uk
- The right to rectify any inaccurate or incomplete personal data held about you;
- The right to erasure where it cannot be justified that the information held satisfies any of the criteria outlined in this policy, or where you have withdrawn consent;
- The right to prevent processing for direct marketing purposes, scientific/historical research or in any such way that is likely to cause substantial damage to you or another, including through profile building; and
- The right to object to processing that results in decisions being made about you by automated processes and prevent those decisions being enacted.

You can exercise your right to access personal data held about you by contacting info@gordoncharlescapital.co.uk with the subject line: "Subject Access Request". When you submit a 'subject access request', you will need to provide confirmation of your identity by including a photocopy of your driver's license or passport. This service is provided free of charge and our response will be made within thirty (30) days, unless our Data Protection Lead deems your request as being excessive or unfounded. If this is the case, we will inform you of our reasonable administration costs in advance and/or any associated delays, giving you the opportunity to choose whether you would like to pursue your request. If you believe we have made a mistake in evaluating your request, please see the section 'Who can you complain to?'.

If you have questions about any of the rights mentioned in this section, please contact our Data Protection Lead at info@gordoncharlescapital.co.uk

Who is the Data Controller?

If we have collected your personal data directly from you for our own purposes, we are the Data Controller.
If we have purchased your personal data from a third-party for our own purposes, we are the Data Controller. Where we have purchased your personal data, we will contact you to let you know before we first start to use it, or, at the latest, within one month of acquiring it.

If we have been passed your personal data from a third-party for our own purposes, we are the Data Controller. We will contact you to let you know before we first start to use it, or, at the latest, within one month of acquiring it.
If we have been passed your personal data from a third-party for a joint purpose that we both influence, we are the joint Data Controller. We will contact you to let you know before we first start to use your data, or, at the latest, within one month of acquiring it.

If your data has been passed to us by a third party for processing under their instruction, that third party is the Data Controller. They should have notified you that they would be passing your personal data to us, **Gordon Charles Capital**,

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at the time they collected your data and within their own privacy notices/standards. For a list of Data Controllers that we process personal data for, the section below 'Third Party Interests'.

If we have received your personal data as part of a business to business relationship, the Data Controller is your employer.

What are the lawful bases for processing personal data?

Under Data Protection Legislation, there must be a 'lawful basis' for the use of personal data. The lawful bases are:

- 'your consent';
- 'performance of a contract';
- 'compliance with a legal obligation';
- 'protection of your, or another's vital interests';
- 'public interest/official authority'; and
- 'our legitimate interests'.

What are our 'legitimate interests'?

Legitimate interests are a flexible basis upon which the law permits the processing of an individual's personal data. To determine whether we have a legitimate interest in processing your data, we balance the needs and benefits to us against the risks and benefits for you of us processing your data. This balancing is performed as objectively as possible by our Data Protection Lead. You are able to object to our processing and we shall consider the extent to which this affects whether we have a legitimate interest.

About our processing of your data

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.
- We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

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Reference	What categories of information about you do we process?	Why are we processing your data?	Where did we get your personal data from?
B2B Marketing	Identity Data Contact Data	Direct marketing to former, current and prospective clients. This processing is conducted lawfully on the basis of 'our legitimate interests'.	Directly obtained or by referral from existing clients / partners / suppliers.
Analytics	Technical Data Usage Data	To understand how you use our website, how you reached us and how long you spend on our website, in order to analyse our performance and improve our service. This processing is conducted lawfully on the basis of 'our legitimate interests'.	Directly obtained or indirectly obtained through a client's website (notice given at the point of collection).
Fraud Prevention	Identity Data Transaction Data	To combat fraud, we share information of clients who instruct the payment issuer to cancel payments to us without first informing us of why and/or allowing us the opportunity to issue a refund with credit reference agencies. This processing is conducted lawfully on the basis of 'protection of your, or another's vital interests'.	Directly obtained or indirectly obtained through a client's website (notice given at the point of collection).
Contact Submission	Identity Data Contact Data	When you send us information about you by posting on a forum or blog, we will store this information in order to make it available for viewing on the website. You consent is obtained at the time of posting and via reference to this notice. This processing is conducted lawfully on the basis of 'your consent'.	Directly obtained or indirectly obtained through a client's website (notice given at the point of collection).
Phone Calls	Identity Data Contact Data	We might record calls for training and/or auditing purposes. We also collect Calling Line Identification information. This is used to help improve the efficiency and accountability of our customer services. This processing is conducted lawfully on the basis of 'our legitimate interests'.	Directly obtained.
Email and Web Contact	Identity Data Contact Data	If you contact us through our website or by email, we will use the information you send in order to respond to your enquiry or complaint. This information will be kept in order to improve our service to you overall. This processing is conducted lawfully on the basis of 'our legitimate interests'.	Directly obtained or indirectly obtained through our website (notice given at the point of collection).
Consumer Marketing	Identity Data Contact Data Transaction Data Marketing and Communications Data	If you make a purchase with us, we will add your contact information to our marketing list and send you information we think you might be interested in. This processing is conducted lawfully on the basis of 'our legitimate interests'.	Directly obtained.

Our use of Cookies

Cookies are small text files that are placed on your computer's hard drive through your web browser when you visit any web site. They are widely used to make web sites work, or work more efficiently, as well as to provide information to the owners of the site.

Like all other users of cookies, we may request the return of information from your computer when your browser requests a web page from our server. Cookies enable our web server to identify you to us, and to track your actions and the pages you visit while you use our website. The cookies we use may last for a single visit to our site (they are deleted from your computer when you close your browser), or may remain on your computer until you delete them or until a defined period of time has passed.

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Although your browser software enables you to disable cookies, we recommend that you allow the use of cookies in order to take advantage of the features of our website that rely on their use. If you prevent their use, you will not be able to use all the functionality of our website. Here are the ways we may use cookies:

- to record whether you have accepted the use of cookies on our web site. This is solely to comply with the law. If you have chosen not to accept cookies, we will not use cookies for your visit, but unfortunately, our site will not work well for you.
- to allow essential parts of our web site to operate for you.
- to operate our content management system.
- to operate the online notification form - the form that you use to contact us for any reason. This cookie is set on your arrival at our web site and deleted when you close your browser.
- to enhance security on our contact form. It is set for use only through the contact form. This cookie is deleted when you close your browser.
- to collect information about how visitors use our site. We use the information to improve your experience of our site and enable us to increase sales. This cookie collects information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from, and the pages they visited.
- to record that a user has viewed a webcast. It collects information in an anonymous form. This cookie expires when you close your browser.
- to record your activity during a web cast. For example, as to whether you have asked a question or provided an opinion by ticking a box. This information is retained so that we can serve your information to you when you return to the site. This cookie will record an anonymous ID for each user, but it will not use the information for any other purpose. This cookie will last for a period of time after which it will delete automatically.
- to store your personal information so that you do not have to provide it afresh when you visit the site next time. This cookie will last for a period of time after which it will delete automatically.
- to enable you to watch videos we have placed on YouTube. YouTube will not store personally identifiable cookie information when you use YouTube's privacy-enhanced mode.

What happens if I refuse to give Gordon Charles Capital my personal data?

The information about you that we have collected for the performance of our contracts is required in order for us to successfully fulfil our obligations to you. If you choose not to provide the personal data requested, we will not be able to enter into a contract with you to provide the benefits we offer. If we are already processing your personal information under a contract, you must end our contractual relationship (as/where permitted) in order to exercise some of your rights.

We process some personal information as part of a contractual relationship with a Data Controller. Any requests to restrict this type of processing should be forwarded to the Data Controller; they will be responsible for discussing your concerns and making any decisions.

What are Gordon Charles Capital's 'legitimate interests'?

Legitimate interests are a flexible basis upon which the law permits the processing of an individual's personal data. To determine whether we have a legitimate interest in processing your data, we balance the needs and benefits to us against the risks and benefits for you of us processing your data. This balancing is performed as objectively as possible by our Data Protection Lead. You are able to object to our processing and we shall consider the extent to which this affects whether we have a legitimate interest. If you would like to find out more about our legitimate interests, please contact info@gordoncharlescapital.co.uk

What profiling or automated decision making do we perform?

Gordon Charles Capital does not perform any profiling or automated decision making based on your personal data.

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How long will your personal data be kept?

Gordon Charles Capital holds different categories of personal data for different periods of time. Wherever possible, we will endeavour to minimise the amount of personal data that we hold and the length of time for which it is held.

- If 'consent' is the basis for our lawful processing of your data, we will retain your data so long as both the purpose for which it was collected, and your consent, are still valid. We review the status of your consent every twelve (12) months and treat non-response to our requests for renewal of consent as if they were your request to withdraw consent. Occasionally, we might identify a legitimate interest in retaining some of your personal data that has been obtained by consent. If we do, we will inform you that we intend to retain it under these conditions and identify the interest specifically.
- Identity, Contact and Transaction Data are held indefinitely (subject to object by the individual, or individual's having left our client's business) in order to provide a superior service to returning customers.
- If we process your data on the basis of 'legitimate interests', we will retain your data for so long as the purpose for which it is processed remains active. We review the status of our legitimate interests every twelve (12) months and will update this notice whenever we determine that either a legitimate interest no longer exists or that a new one has been found.
- All categories of personal data that are held by us because they are essential for the performance of a contract, will be held for a period of six years, as determined by reference to the Limitations Act 1980, for the purposes of exercising or defending legal claims.

Who else will receive your personal data?

Gordon Charles Capital passes your data to the third parties listed in the section 'Third Party Interests' below, for the purpose of providing our services to you, and for no other purpose.

Does your data leave the EU?

Gordon Charles Capital uses overseas web and IT providers. Details of what data is sent where, and the safeguards in place, are included in the section 'Third Party Processors' below.

Third Party Interests

Data Controllers

Name of Third Party Controller	What processing are we performing for them?	If applicable - who is their representative within the EU?
HMRC, regulatory authorities or other authorities	We are joint Controller with these authorities who require reporting of processing in some situations	N/A
Postal/Courier Providers	Where these providers act as Data Controller, we are joint Controller with them for the purposes of sending you physical documents.	N/A

Data Processors

Name of Third Party Processor	Purposes for Carrying out Processing
Social Media	Marketing
Xero	Accountancy
Signable	Electronic signatures
MS Teams / GMeet / Zoom / WhatsApp	Calls and video conferencing

Who can you complain to?

In addition to sending us your complaints directly info@gordoncharlescapital.co.uk, you can send complaints to our supervisory authority. As **Gordon Charles Capital** predominantly handles the personal data of UK nationals, our supervisory authority is the Information Commissioner's Office. If you believe that we have failed in our compliance with data protection legislation, complaints to this authority can be made by visiting ico.org.uk.

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