

GCFA Privacy Policy

1. PURPOSE OF THIS NOTICE

This privacy notice explains our approach to any personal information that you might supply to us (or that might be collected from you) in connection with your use of the Site and sets out your rights in respect of our processing of your personal information. This privacy notice will inform you how you can verify which of your personal information is collected by us through the Site and how you can request that we delete, update or transfer it. The notice only applies to the use of personal information collected by us from your use of the Site or during your communications with us. It does not apply to personal information collected during your communications with third parties.

2. WHO ARE WE AND WHAT DO WE DO?

The Site is operated by Eco Age Limited (“we” “us” or “our”) whose principal activities include communications and sustainability consultancy. Eco Age Limited is the data controller responsible for your personal information. Eco Age Limited is registered at the UK Information Commissioner’s Office with registration number ZA246515. Eco Age Limited is an English company with registered company number 5855157 and whose registered address is 10 Orange Street, Haymarket, London, WC2H 7DQ.

3. HOW TO CONTACT US?

If you have any questions about this privacy notice or want to exercise your rights, please contact us by contacting the The Data Protection Officer or writing to us at The Data Protection Officer, Eco Age Limited, Gemini House, 334-336 King Street, London, W6 ORR.

4. WHAT PERSONAL INFORMATION DO WE COLLECT AND HOW DO WE USE IT?

Personal information is collected from you in the following ways:

a) Information you voluntarily provide to us – we collect and maintain personal information that you voluntarily submit to us during your use of the Site (e.g. when registering with us or when you correspond with us) or if you sign up with us at an offline event. In particular we collect:

- Name;
- Title;
- Email address; and
- Other information that you provide to us (which may include information provided in any questions, comments or feedback you leave on the site).

b) Information we collect through your use of the Site – through our use of cookies, log files and other technologies, we collect personal information and other information regarding your mobile device or the computer hardware and software used to access the Site. This personal information allows us to deliver more helpful information, services and tools. This includes the following:

- IP address of device(s) used;
- Browser type;
- Operating system and device type;
- Approximate location (e.g. London);
- Access times and dates; and
- Referring website addresses

c) Information we collect from third parties. For more information see below.

– we may also combine personal information that we collect through your use of the Site with personal information that you have provided to third parties and in respect of which you have given the third party permission to share with us or that we have obtained from a public record (e.g. the electoral roll).

5. HOW DO WE USE YOUR PERSONAL INFORMATION?

Our primary goal in collecting personal information from you is to:

- (i) *verify your identity,*
- (ii) *help us improve the Site, improve our campaigns and develop new campaigns and areas of interest,*
- (iii) *carry out requests made by you on the Site,*
- (iv) *investigate or settle inquiries or disputes,*
- (v) *comply with any applicable law, court order, other judicial process, or the requirements of a regulator,*
- (vi) *enforce our agreements with you such as our website terms and conditions of use,*
- (vii) *protect the rights, property or safety of us or third parties, including other users of the Site,*
- (viii) *provide support and security for the Site and the Functionality, and*
- (ix) *use such information as otherwise required or permitted by law.*

We will obtain your explicit consent to use your personal information for the provision of Site and the Functionality. It is also in our legitimate business interests to respond to any requests you make to us or use the information you provide to us in your feedback in order to improve our products and services.

If you have consented to us doing so we will add you to our mailing list for purposes of campaign updates, promotional and marketing messages and other communications. These mailing lists are used to provide you with further information about our work, companies we support and relevant news if you want it.

We may share your personal information collected on the Site with third parties as appropriate to:

- (i) *carry out the activity or request made by you on the Site,*
- (ii) *comply with any applicable law, court order, other judicial process, or the requirements of a regulator,*
- (iii) *enforce our agreements with you,*
- (iv) *protect the rights, property or safety of us or third parties, including other users of the Sites,*
- (v) *perform investigative security analysis on the Site, or*
- (vi) *as otherwise required or permitted by law.*

The types of third party we share your personal information with are platform providers which allow us to deliver the Functionality on the Site and to host and store your personal data. We rely on our website development partner 89up/90up to develop the Site and deliver the Functionality. 89up acts as data processor in relation to the collection and processing of your personal data and will only process such personal data as directed by us in accordance with data protection law.

We may also share your personal information with professional advisers or regulatory authorities:

- (i) *to enable them to process your personal information on our behalf in a manner consistent with this privacy notice;*
- (ii) *to comply with our legal obligations;*
- (iii) *to enforce our legal rights; or*
- (iv) *protect rights of third parties.*

Your personal information may also be shared with prospective buyers if we go through a business transition such as a merger, acquisition by another company, or sale of all or a portion of our assets.

Any other purposes for which we wish to use your personal information will be notified to you either by updating our privacy notice or otherwise from time to time including the legal basis of such use.

Our web pages and emails contain web beacons or “pixel tags.” Web beacons and pixel tags allow us to track receipt of an email to you, to count users that have visited a web page or opened an e-mail and collect other types of aggregate information. By using this information, we are able to measure the effectiveness of our content and how visitors use our Site (and use this information to improve the Site). This allows us to learn what pages are most attractive to our visitors, which parts of our Site is the most interesting and what kind of information our registered users like to see.

Some of the web beacons that are placed on our Sites are used only by us, and other web beacons are used by our service providers on our behalf to analyse how our Site is being used. Once you click on an email that contains a web beacon, your contact information is subsequently cross-referenced to the source e-mail and the relevant web beacon or pixel tag information.

6. HOW DO WE OBTAIN YOUR CONSENT?

Where our use of your personal information requires your consent, you can provide such consent at the time we collect your personal information following the instructions provided; or by informing us by e-mail, post or phone using the contact details set out in this privacy notice.

7. USE OF COOKIES

Our Site uses certain cookies, pixels, beacons, log files and other technologies of which you should be aware. Please see our Cookie Policy to find out more about the cookies we use and how to manage and delete cookies.

8. THIRD PARTY LINKS AND SERVICES

It is likely that the Site will contain links to third party websites and services. Please remember that when you use a link to go from our Site to another website or you request a service from a third party, this privacy notice no longer applies. This privacy notice applies solely to personal information collected by us through our Site and Functionality and does not apply to these third party websites and third party service providers.

9. TRANSFERS OUTSIDE THE EEA

We do not transfer your personal information outside of the EEA.

10. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR?

We do not keep your personal information for any specific period but we will not keep it for longer than is necessary for our purposes. In considering how

long to keep it, we will take into account its relevance to our business and our legal and regulatory obligations. If your information is only useful for a short period e.g. for specific campaigns we will delete it.

11. CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL INFORMATION

We are committed to keeping the personal information you provide us secure and we will take reasonable precautions to protect your personal information from loss, misuse or alteration. All our employees and data processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with the processing of personal information, are obliged to respect the confidentiality of the personal information of all users of the Site.

12. HOW TO ACCESS YOUR INFORMATION AND YOUR OTHER RIGHTS?

You have the following rights in relation to the personal information we hold about you:

a) Your right of access

If you ask us, we'll confirm whether we're processing your personal information and, if so, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.

b) Your right to rectification

If the personal information we hold about you is inaccurate or incomplete, you're entitled to have it rectified. If we've shared your personal information with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

c) Your right to erasure

You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or you withdraw your consent (where applicable). If we've shared your personal information with others, we'll let them know about the erasure where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

d) Your right to restrict processing

You can ask us to 'block' or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or object to us processing it. It won't stop us from storing your personal information though. We'll tell you before we lift any restriction. If we've shared your personal information with others, we'll let them know about the restriction where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

e) Your right to data portability

You have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, standardised and machine-readable format) and to reuse it elsewhere or ask us to transfer this to a third party of your choice.

f) Your right to object

You can ask us to stop processing your personal information, and we will do so if we're relying on our own or someone else's legitimate interests to process your personal information except if we can demonstrate compelling legal grounds for the processing.

g) Your rights in relation to automated decision-making and profiling

You have the right not to be subject to a decision when it's based on automatic processing, including profiling, and it produces a legal effect or similarly significantly affects you unless such profiling is necessary for entering into, or the performance of, a contract between you and us.

h) Your right to withdraw consent

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.

i) Your right to lodge a complaint with the supervisory authority

If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the UK Information Commissioner's Office (ICO). You can find details about how to do this on the ICO website at <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113.

13. CHANGES TO THIS PRIVACY NOTICE

We may make changes to this privacy notice from time to time. To ensure that you are always aware of how we use your personal information we will update this privacy notice from time to time to reflect any changes to our use of your personal information. We may also make changes as required to comply with changes in applicable law or regulatory requirements. We may notify you by e-mail of any significant changes. However, we encourage you to review this privacy notice periodically to be informed of how we use your personal information.